

**U.S. Bankruptcy Court
California Northern Bankruptcy Court (San Francisco)
Bankruptcy Petition #: 19-30088**

Assigned to: Judge Dennis Montali
Chapter 11
Voluntary
Asset

Date filed: 01/29/2019
Plan confirmed: 06/20/2020
341 meeting: 04/29/2019
Deadline for filing claims: 10/21/2019
Deadline for filing claims (govt.): 10/21/2019

Debtor

PG&E Corporation
77 Beale Street
P.O. Box 770000
San Francisco, CA 94177
SAN FRANCISCO-CA
(929) 333-8977
Tax ID / EIN: 94-3234914

represented by **Max Africk**
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000
TERMINATED: 11/12/2019

Peter J. Benvenutti
Keller Benvenutti Kim LLP
650 California St. 19th Fl.
San Francisco, CA 94108
(415) 364-6798
Email: pbenvenutti@kbklp.com

Kevin Bostel
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Lee Brand
Pillsbury Winthrop Shaw Pittman LLP
Four Embarcadero Center, 22nd Fl.
San Francisco, CA 94111-5998
415-983-1116
Email: lee.brand@pillsburylaw.com

Timothy G. Cameron
Cravath, Swaine & Moore LLP
Worldwide Plaza
825 8th Ave.
New York, NY 10019
(212) 474-1120

Jared R. Friedmann
Weil, Gotshal & Manges LLP
767 Fifth Ave.
New York, NY 10153
(212) 310-8000

Andriana Georgallas
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Stuart J. Goldring
Weil, Gotshal & Manges LLP
767 Fifth Ave.
New York, NY 10153
(212) 310-8000

Matthew Goren
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

David A. Herman
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
212-474-1000

David Franklin Hill, IV
Weil, Gotshal and Manges, LLP
767 Fifth Ave.
New York, NY 10153
(212) 310-8000

Stephen Karotkin
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Tobias S. Keller
Keller Benvenuti Kim LLP
650 California St. #1900
San Francisco, CA 94108
(415) 796-0709
Email: tkeller@kbkllp.com

Jane Kim
Keller Benvenuti Kim LLP
650 California St, Suite 1900
San Francisco, CA 94108
(415) 364-6793
Email: jkim@kbkllp.com

Katherine Kohn
Groom Law Group, Chartered
1701 Pennsylvania Ave, NW #1200
Washington, DC 20006
(202) 861-2607
Email: kkohn@groom.com

Kevin Kramer
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

David Levine
Groom Law Group, Chartered
1701 Pennsylvania Ave, NW #1200
Washington, DC 20006
(202) 861-5436

Email: dnl@groom.com

Dara Levinson Silveira
Keller Benvenuti Kim LLP
650 California St. #1900
San Francisco, CA 94108
415-364-6793
Email: dsilveira@kbkllp.com

Jessica Liou
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Omid H. Nasab
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
212-474-1000

John Nolan
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Kevin J. Orsini
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
212-474-1000

Scott Reents
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, NY 10019
212-474-1000
Email: sreents@cravath.com

Thomas B. Rupp
Keller Benvenuti Kim LLP
650 California Street, Suite 1900
San Francisco, CA 94108
415-636-9015
Email: trupp@kbkllp.com

Bradley R. Schneider
Munger Tolles and Olson LLP
350 S Grand Ave., 50th Fl.
Los Angeles, CA 90071
(213) 683-9100
Email: bschneider@kbkfirm.com
TERMINATED: 05/18/2022

Ray C. Schrock
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Richard W. Slack
Weil Gotshal and Manges, LLP

767 Fifth Ave.
New York, NY 10153-0119
(212) 310-8000
Email: richard.slack@weil.com

Theodore Tsekerides
Weil, Gotshal & Manges LLP
767 Fifth Avenue
New York, NY 10153
212-310-8000

Paul H. Zumbro
Cravath, Swaine & Moore LLP
85 Eighth Avenue
New York, NY 10019
2124741000
Email: mao@cravath.com

Responsible Ind
Jason P. Wells
Senior Vice President
Chief Financial Officer PG&E Corporation
77 Beale St.
San Francisco, CA 94177
(929) 333-8977

U.S. Trustee
Office of the U.S. Trustee / SF
Phillip J. Burton Federal Building
450 Golden Gate Ave. 5th Fl., #05-0153
San Francisco, CA 94102
(415)705-3333

represented by **Jason Blumberg**
Office of the U.S. Trustee
501 I St. #7-500
Sacramento, CA 95814
(916) 930-2076
Email: jason.blumberg@usdoj.gov

Cameron M. Gulden
DOJ-Ust
300 Booth Street
Room 3009
Reno, NV 89509
775-784-5662
Fax : 775-784-5531
Email: cameron.m.gulden@usdoj.gov

Lynette C. Kelly
Office of the United States Trustee
Phillip J. Burton Federal Building
450 Golden Gate Ave. 5th Fl., #05-0153
San Francisco, CA 94102
(415) 252-2065
Email: ustpregion17.oa.ecf@usdoj.gov

Timothy S. Laffredi
Office of the U. S. Trustee – San Jose
280 South 1 St., Suite 268
San Jose, CA 95113
(408) 535-5525
Email: timothy.s.laffredi@usdoj.gov

Timothy S. Laffredi
Office of the U.S. Trustee – SF
450 Golden Gate Ave.
Suite 05-0153
San Francisco, CA 94102

(415) 705-3333
Email: timothy.s.laffredi@usdoj.gov

Marta Villacorta

Office of the United States Trustee
Phillip J. Burton Federal Building
450 Golden Gate Ave. 5th Fl., #05-0153
San Francisco, CA 94102
(415) 252-2062
Email: marta.villacorta@usdoj.gov

Creditor Committee
Official Committee Of Unsecured Creditors

represented by **Paul S. Aronzon**
Milbank LLP
2029 Century Park East, 33rd Fl.
Los Angeles, CA 90067
(424) 386-4000
Email: paronzon@milbank.com

James C. Behrens

Milbank, LLP
2029 Century Park E, 33rd Fl.
Los Angeles, CA 90067
(424) 386-4436
Email: jbehrens@milbank.com

Gregory A. Bray

Milbank LLP
2029 Century Park East, 33rd Fl.
Los Angeles, CA 90067
(424) 386-4470
Email: gbray@milbank.com

Erin Elizabeth Dexter

Milbank LLP
1850 K St., NW, #1100
Washington, DC 20006
(202) 835-7500
Email: edexter@milbank.com

Dennis F. Dunne

Milbank, LLP
55 Hudson Yards
New York, NY 10001-2163
(212) 530-5000
Email: ddunne@milbank.com

Samuel A. Khalil

Milbank, LLP
55 Hudson Yards
New York, NY 10001-2163
(212) 530-5000
Email: skhalil@milbank.com
TERMINATED: 08/30/2022

Thomas R. Kreller

Milbank LLP
2029 Century Park East, 33rd
Los Angeles, CA 90067
(424) 386-4463
Email: tkreller@milbank.com
TERMINATED: 08/30/2022

Andrew Michael Leblanc
Milbank LLP
1850 K St., NW, #1100
Washington, DC 20006
(202) 835-7500
Email: ALeblanc@milbank.com

Alan J. Stone
Milbank LLP
55 Hudson Yards
New York, NY 10001
(212) 530-5000
Email: AStone@milbank.com

Creditor Committee
Official Committee of Tort Claimants

represented by **Lauren T. Attard**
Baker Hostetler LLP
11601 Wilshire Blvd. #1400
Los Angeles, CA 90025-0509
(310) 820-8800
Email: lattard@bakerlaw.com

Chris Bator
Baker & Hostetler LLP
127 Public Square #2000
Cleveland, OH 44114
(216) 621-0200
Email: cbator@bakerlaw.com

Dustin M. Dow
Baker & Hostetler LLP
127 Public Square #2000
Cleveland, OH 44114
(216) 621-0200
Email: ddow@bakerlaw.com

Cecily Ann Dumas
Baker and Hostetler LLP
Transamerica Pyramid Center
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
415-659-2600
Email: cdumas@bakerlaw.com

Joseph M. Esmont
Baker & Hostetler LLP
127 Public Sq., #2000
Cleveland, OH 44147
(216) 861-7835
Email: jesmont@bakerlaw.com

Lars H. Fuller
Baker & Hostetler LLP
1801 California St #4400
Denver, CO 80202
(303) 764-4114
Email: lfuller@bakerlaw.com

Eric R. Goodman
Brown Rudnick LLP
601 Thirteenth St. NW, #600
Washington, DC 20005
(202) 536-1740

Email: egoodman@bakerlaw.com
TERMINATED: 04/07/2021

Elizabeth A. Green
BakerHostetler LLP
200 S. Orange Ave. #2300
Orlando, FL 32801
(407) 649-4000
Email: egreen@bakerlaw.com

Robert A. Julian
Baker and Hostetler LLP
Transamerica Pyramid Center
600 Montgomery Street, Suite 3100
San Francisco, CA 94111-2806
(415) 569-2600
Email: rjulian@bakerlaw.com

Elyssa S. Kates
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
(212) 589-4227
Email: ekates@bakerlaw.com

Kody D. L. Kleber
Baker & Hostetler LLP
811 Main St., #1100
Houston, TX 77005
(713) 703-1315
Email: kkleber@bakerlaw.com

John H. MacConaghy
MacConaghy and Barnier
645 1st St. W #D
Sonoma, CA 95476
(707) 935-3205
Email: macclaw@macbarlaw.com

Kimberly S. Morris
Baker & Hostetler LLP
Transamerica Pyramid Center
600 Montgomery Street, Suite 3100
San Francisco, CA 94111
(415) 659-2600
Email: kmorris@bakerlaw.com

David J. Richardson
Baker & Hostetler, LLP
11601 Wilshire Blvd.,
14th Floor
Los Angeles, CA 90025
(310) 442-8858
Email: drichardson@bakerlaw.com

David B. Rivkin, Jr.
Baker and Hostetler LLP
1050 Connecticut Ave., N.W., #1100
Washington, DC 20036
(202) 861-1731
Email: drivkin@bakerlaw.com

Jorian L. Rose

Baker & Hostetler LLP
 45 Rockefeller Plaza
 New York, NY 10111
 (212) 589-4200
 Email: jrose@bakerlaw.com

Eric E. Sagerman
 Baker and Hostetler LLP
 11601 Wilshire Blvd. #1400
 Los Angeles, CA 90025
 (310) 442-8875
 Email: esagerman@bakerlaw.com

Catherine E. Woltering
 Baker & Hostetler LLP
 Key Tower, 127 Public Sq., #2000
 Cleveland, OH 44114-1214
 (614) 462-2677
 Email: cwoltering@bakerlaw.com
 TERMINATED: 04/01/2020

Filing Date	#	Docket Text
07/22/2021	<u>10980</u>	Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims) (RE: related document(s) <u>10808</u> Objection filed by Debtor PG&E Corporation). (Attachments: # <u>1</u> Exhibit 1A # <u>2</u> Exhibit 1B) (lp) (Entered: 07/22/2021)
10/14/2022	<u>13084</u>	Notice of Appeal to District Court , Fee Amount \$ 0.00. (RE: related document(s) <u>10980</u> Order on Objection). Appellant Designation due by 10/31/2022. Statement of Issues due by 10/31/2022. Transmission of Record to District Court due by 11/14/2022. Filed by Interested Party Ricky-Dean Horton (myt) (Entered: 10/17/2022)
10/18/2022	<u>13091</u>	Deficiency Letter Regarding(RE: related document(s) <u>13084</u> Notice of Appeal to District Court , Fee Amount \$ 0.00. (RE: related document(s) <u>10980</u> Order on Objection). Appellant Designation due by 10/31/2022. Statement of Issues due by 10/31/2022. Transmission of Record to District Court due by 11/14/2022. Filed by Interested Party Ricky-Dean Horton (myt)). (myt) Additional attachment(s) added on 10/18/2022 (myt). (Entered: 10/18/2022)
10/20/2022	<u>13102</u>	Courts Certificate of Mailing. Number of notices mailed: 9 (RE: related document(s) <u>10980</u> Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims), <u>13084</u> Notice of Appeal). (dc) (Entered: 10/20/2022)



Signed and Filed: July 22, 2021

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenuti (#60566)
(pbenvenuti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

DENNIS MONTALI
U.S. Bankruptcy Judge

Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**ORDER DISALLOWING AND EXPUNGING
PROOFS OF CLAIM PURSUANT TO
REORGANIZED DEBTORS' NINETY-THIRD
OMNIBUS OBJECTION TO CLAIMS (NO
LEGAL LIABILITY CLAIMS)**

[Re: Dkt. Nos. 10808, 10960]

1 Upon the *Reorganized Debtors' Report on Responses to Eighty-Eighth Through Ninety-Sixth*
2 *Omnibus Objections to Claims and Request for Orders by Default as to Unopposed Objections* [Docket
3 *No. 10960*] (the “**Request**”) of PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric
4 Company (the “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**”
5 or as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) in the above-
6 captioned chapter 11 cases (the “**Chapter 11 Cases**”), pursuant to Rule 9014-1(b)(4) of the Bankruptcy
7 Local Rules for the United States District Court for the Northern District of California, as made
8 applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and*
9 *Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”),
10 that the Court enter an order by default on the *Reorganized Debtors' Ninety-Third Omnibus Objection*
11 *to Claims (No Legal Liability Claims)* [Docket No. 10808] (the “**Ninety-Third Omnibus Objection**”),
12 all as more fully set forth in the Request, and this Court having jurisdiction to consider the Request and
13 the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy
14 Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule
15 5011-1(a); and consideration of the Request and the requested relief being a core proceeding pursuant to
16 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409;
17 and the Court having found and determined that notice of the Request as provided to the parties listed
18 therein is reasonable and sufficient under the circumstances, and it appearing that no other or further
19 notice need be provided; and this Court having determined that the legal and factual bases set forth in
20 the Request establish just cause for the relief sought; and upon all of the proceedings had before this
21 Court and after due deliberation and sufficient cause appearing therefor,

22 **IT IS HEREBY ORDERED THAT:**

- 23 1. The below Proofs of Claim shall be treated as follows:

Docket No.	Claimant	Claim No.	Resolution
10907	Duivenvoorden, Marcus	75903	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.

Docket No.	Claimant	Claim No.	Resolution
10919	Chappell, Lamont	9946	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
10918	California Department of Housing and Community Development	56868	This matter has been continued to the September 14, 2021 Omnibus Hearing.
Informal	City of San Carlos	68838	This matter has been continued to the August 10, 2021 Omnibus Hearing.
10946	Richards, Darwin	86933 96962	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.

2. The Claims listed in the columns headed "Claims To Be Disallowed and Expunged" in **Exhibit 1A** and **Exhibit 1B**¹ hereto are disallowed and expunged.

3. This Court shall retain jurisdiction to resolve any disputes or controversies arising from this Order.

*** END OF ORDER ***

¹ **Exhibit 1B** has been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objections to Claims*, entered on June 21, 2021 [**Docket No. 10832**].

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Chapman, Warren Clapp Moroney, et al 5860 Owens Drive Suite 410 Pleasanton, CA 94588		78834	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Court Order
Coltan, Michael 7930 Flynn Creek Road PO Box 379 Comptche, CA 95427		81232	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$4,947.78	\$4,947.78	Barred by Court Order
Eggleston, Coaster 855 C" Street Apt. # 304 San Rafael, CA 94901		4457	PG&E Corporation	7/30/2019	\$0.00	\$0.00	\$12,450.00	\$2,487,550.00	\$2,500,000.00	No Liability Based on Investigation
Ellis, Donald Ray 125 Corte Maria Pittsburg, CA 94565-4121		6888	PG&E Corporation	8/13/2019	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00	Barred by Court Order
Hanson Aggregates Mid-Pacific, Inc. Joseph Audal 3000 Executive Parkway Suite 240 San Ramon, CA 94583		70657	Pacific Gas and Electric Company	10/16/2019	\$173,304.00	\$0.00	\$0.00	\$0.00	\$173,304.00	No Liability Based on Investigation
Horton, Ricky D. 751 Rosemary Court Fairfield, CA 94533		87111	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$50,000,000.00	\$50,000,000.00	Barred by Statute of Limitations - Personal Injury
Motahari-Fard, Saeedeh Law Offices of Steven D. Hoffman Attn: Saeedeh Motahari-Fard Sunnyvale, CA 94086		3882	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$31,576.00	\$31,576.00	Barred by Court Order
Perez, Juan M. Gilleon Law Firm, APC c/o James C. Mitchell (SBN 87151) 1320 Columbia Street, Suite 200 San Diego, CA 92101		7666	PG&E Corporation	8/20/2019	\$0.00	\$0.00	\$0.00	\$4,000,000.00	\$4,000,000.00	Barred by Court Order

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
R Tad Heydenfeldt, Agent, Rasar, Inc on behalf of United Trust Fund R Tad Heydenfeldt 5255 Clayton Road #210 Concord, CA 94521		4606	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$250,000,000.00	\$250,000,000.00	Barred by Statute of Limitations - Breach of Written Contract
Roman, Geoffrey Law Offices of Paul Aghabala & Associates, Inc. Ani Shagvaladyan, Esq. 15250 Ventura Blvd Ste 500 Sherman Oaks, CA 91403-3217		23522	PG&E Corporation	9/30/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Roman, Geoffrey Prestige Law Firm, P.C. Ani Shasivaladyan, Esq. P.Paul Asihabala, Esq. 15250 Ventura Blvd., Suite 500 Sherman Oaks, CA 91403		105758	PG&E Corporation	6/2/2020	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Titus, Leona A 25820 Coombe Hill Drive Sun City, CA 92586		86900	Pacific Gas and Electric Company	10/23/2019	\$0.00	\$0.00	\$0.00	\$14,000,000.00	\$14,000,000.00	Barred by Statute of Limitations - Personal Injury
Vodonick, John 11464 Willow Valley Road Nevada City, CA 95959		19917	PG&E Corporation	10/9/2019	\$25,000.00	\$0.00	\$0.00	\$225,000.00	\$250,000.00	Barred by Statute of Limitations - Damage to Real or Personal Property and No Liability Based on Investigation
Claims To Be Expunged Totals		Count: 13			\$198,304.00		\$0.00	\$12,450.00	\$321,249,073.78	\$321,459,827.78

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	8/14/2019	\$0.00	\$0.00	\$0.00	\$1,600,000.00	\$1,600,000.00	Barred by Statute of Limitations - Personal Injury and Barred by Previous Settlement Agreement
Redacted		Redacted	Pacific Gas and Electric Company	10/12/2019	\$0.00	\$0.00	\$66,074.00	\$0.00	\$66,074.00	Preempted by NLRA
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Previous Settlement Agreement and Preempted by
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Previous Settlement Agreement and Preempted by
Redacted		Redacted	Pacific Gas and Electric Company	4/20/2021	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - "Catch-all" Statute
Redacted		Redacted	Pacific Gas and Electric Company	7/29/2019	\$0.00	\$0.00	\$20,000.00	\$0.00	\$20,000.00	Barred by Statute of Limitations - Breach of Written Contract and Preempted by NLRA
Redacted		Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,679,000.00	\$0.00	\$12,679,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	9/25/2019	\$0.00	\$0.00	\$12,679,000.00	\$0.00	\$12,679,000.00	Payroll Withholding Claims

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	Pacific Gas and Electric Company	9/16/2019	\$0.00	\$0.00	\$14,104.32	\$0.00	\$14,104.32	Barred by Previous Settlement Agreement
Redacted		Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,570,000.00	\$0.00	\$12,570,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,570,000.00	\$0.00	\$12,570,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$0.00	\$11,728,000.00	\$11,728,000.00	Payroll Withholding Claims
Redacted		Redacted	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$1,450.00	\$1,450.00	Preempted by NLRA
Redacted		Redacted	Pacific Gas and Electric Company	9/23/2019	\$0.00	\$0.00	\$15,000.00	\$0.00	\$15,000.00	Preempted by NLRA
Redacted		Redacted	PG&E Corporation	10/23/2019	\$0.00	\$0.00	\$64,560.00	\$0.00	\$64,560.00	Barred by Statute of Limitations - Breach of Written Contract and Barred by Previous Settlement Agreement
Redacted		Redacted	PG&E Corporation	10/22/2019	\$0.00	\$0.00	\$86,034.64	\$0.00	\$86,034.64	Barred by Statute of Limitations - Breach of Written Contract and Barred by Previous Settlement Agreement

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	8/1/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Employment Discrimination
Redacted		Redacted	PG&E Corporation	8/12/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Breach of Written Contract and Preempted by NLRA
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted		Redacted	PG&E Corporation	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted		Redacted	PG&E Corporation	10/7/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	10/4/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	10/17/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	11/4/2019	\$0.00	\$12,961,000.00	\$0.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims

Redacted Version of Exhibit 1B

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims
Claims To Be Expunged Totals		Count: 25			\$0.00	\$12,961,000.00	\$103,305,772.96	\$16,709,450.00	\$132,976,222.96	

1 Ricky-Dean Horton
2 751 Rosemary Court
3 Fairfield, California [94533]
4 Cell: 707-386-9713
5 RickyDHorton@gmail.com

6
7 **UNITED STATES BANKRUPTCY COURT**
8 **NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN FRANCISCO DIVISION**

10
11 RICKY-DEAN HORTON, A LIVING MAN

12 Claimant/Appellant,

13 vs.

14 **PG&E CORPORATION,**

15 **- and/or -**

16 **PACIFIC GAS AND ELECTRIC**

17 **COMPANY*;**

18 **Debtors/Appellees.**

19 ** All papers shall be filed in the Lead Case, No.*
20 *19-30088 (DM)*

Bankruptcy Case No.: 19-30088 (DM) Chapter
11, Jointly Administered.

Claimant/Appellant claim no. 87111

NOTICE OF INERLOCUTORY APPEAL;
MOTION FOR LEAVE TO APPEAL.

21
22
23 1. Notice is given that Ricky-Dean Horton, Claimant/Appellant, appeals to the United States

24 Ninth Circuit District Court Northern District of California, 28 USC 158 (a)(3);

25 2. Claimant/Appellant elects to have this appeal heard by the district court, 28 USC 158 (c)(1)A;

26 3. Claimant/Appellant Motions the court for leave to appeal. FRBP Rule 8004(b).
27
28

NOTICE OF INERLOCUTORY APPEAL; MOTION FOR LEAVE TO APPEAL. - 1

1 **SUMMARY**

2 (A) Claimant/Appellant missed the deadline to object in writing to Debtor's/Appellee's
3 request for disallowing and expunging claimant's/appellant's claim no. 87111 (dkt 10808, 10809,
4 10810);

5
6 (B) Claimant/appellant personally appeared by video conference at the hearing on July 28,
7 2021 as scheduled on dkt 10808 to object on the record of the attempt to disallow and expunge
8 claimant's/appellant's claim no. 87111, and the default judgement found on dkt. 10980;

9 (C) Pursuant to the results of the hearing in front of Judge Montali on July 28, 2021,
10 Claimant/appellant filed motions for reconsideration with compelling arguments to reverse the
11 default order, and placed the motions on calendar for hearing (dkt 11074);

12
13 (D) It appears that Judge Montali entered an order removing the hearing, ordered the
14 debtors/appellees to respond to claimant's/appellant's motions , and to have the court enter an
15 order based on the debtor's/appellee's response (dkt 11135);

16
17 (E) Claimant/appellant, via email, informed Lorena Parada, Courtroom Deputy/Calendar
18 Clerk to Judge Montali, that the form of order is opposed pursuant to page 11, paragraph 2 in
19 PDF file found on the Bankruptcy Court's website called "*Practices and Procedures 3-30-21.pdf*"
20 and, among other things, questioned if the order was personally authored by Hon. Judge Montali.
21 (dkt 11150);

22
23 (F) Claimant/appellant motioned the court to strike the order found in dkt 11135; and
24 upon claimant/appellant realizing the hearing date previously scheduled on dkt 11074 did not
25 conform to PG&E's Open Calendar Procedure found in PDF file
26 "DMPGEOpenCalendarCovid_0.pdf", claimant/appellant followed the proper procedures and
27 rescheduled the hearing for October 19, 2021 (dkt 11174);
28

NOTICE OF INERLOCUTORY APPEAL; MOTION FOR LEAVE TO APPEAL. - 2

1 (G) Additional orders bearing an electronic stamp continued to deny
2 claimant's/appellant's motions and removal of Claimant's/Appellant's right to a hearing
3 regarding all motions, both by claimant/appellant and and debtors/appellees (dks 11244, 11386);
4

5 (H) Claimant/Appellant repeatedly brought attention to B.L.R. 9021-1(a) which states in
6 part, "*no proposed forms of orders granting or denying motions shall be submitted with*
7 *the moving or opposition papers prior to hearing*" (dks 11174, 11183,11251)
8

9 (I) Claimant/appellant feels that his motion to reverse the order found in docket 10808
10 should have been granted;

11 (J) Claimant/Appellant did attend the ZOOM video hearing on October 19, 2021 as
12 scheduled;

13 (K) Procedures for the end of a scheduled video ZOOM hearing allows for other parties
14 to address the court by "raising their hand";

15 <https://www.canb.uscourts.gov/procedure/connecting-court-hearing-zoom-0> ;
16

17 (L) Following the scheduled hearing on October 19, 2021, claimant/appellant raised his
18 electronic hand and motioned verbally in the camera that he wanted to be heard, but to no
19 avail. Judge Montali abruptly ended the hearing, causing claimant/appellant to be denied
20 the opportunity to address the court in any regard.

21 **QUESTIONS**

- 22
- 23 1. Is the court allowed to make orders allowing or denying the Claimant's/appellant's
24 motions prior to a hearing?
 - 25 2. Is the court obligated to resolve disputes or controversies regarding the court's
26 orders?
27
28

- 1 3. Did the claimant/appellant attempt to properly follow the Bankruptcy court's
2 procedures for scheduling a hearing?
3
4 4. Under any of the dockets filed by claimant/appellant, including but not limited to
5 docket 11377, was there cause to allow the hearing to take place and to question
6 witnesses at the hearing? (dks 11074, 11150, 11174, 11183, 11251, 11377, 11415,
7 11416, 11434, 11435)
8
9 5. Is there enough evidence in the motions and dockets filed by claimant/appellant for
10 this circuit court to reverse the order found in docket 10980 that disallowed and
11 expunged claimant's/appellant's claim no. 87111?

12 **RELIEF SOUGHT**

- 13 (a) Claimant/appellant seeks to have the default order found in docket 10980 to be
14 reversed;
15
16 (b) Claimant/appellant seeks to have his motions heard and ruled upon at a hearing;
17
18 (c) Claimant/appellant seeks to have his claim continued in the Bankruptcy Court;
19
20 (d) Claimant/appellant seeks to have his claim for the death of his brother, Rory-Nelson,
21 to be heard in a trial by jury if no restitution can be agreed upon by the
22 debtors/apellees.
23
24 (e) Claimant/appellant seeks to have any order affecting his case to be signed with a wet
25 ink signature of the judge;
26
27 (f) Any other relief that the district court may deem to be just and reasonable.

28 In addition to the aforementioned information, **LEAVE TO APPEAL SHOULD BE
GRANTED;**

- (i) Claimant's/appellant's father became seriously ill in August 2021;

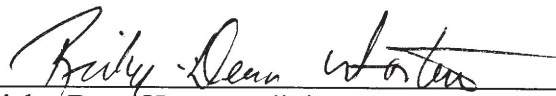
- 1 (ii) Claimant/appellant was primarily responsible for the health and well-being of
2 both his father and his mother;
- 3 (iii) Claimant's/appellant's father seccumbed to his illness and died on November 14,
4 2021 leaving claimant's/appellant's mother without the care she needed from her
5 husband;
- 6 (iv) Claimant's/appellant's mother needed ongoing care and assistance following the
7 death of his father, leaving claimant/appellant to be mostly responsible for his
8 mother's care until she too passed away on June 6, 2022;
- 9 (v) Prior to claimant's/appellant's reasonable delay of filing this appeal,
10 claimant/appellant made good faith efforts to motion and allow the Bankruptcy
11 Court to reverse the default order found in docket 10980;
- 12 (vi) Claimant/appellant has a right to be heard;
- 13 (vii) The PG&E bankruptcy case is still on-going (case No. 19-30088(DM);
- 14 (viii) No prejudicial effect will come upon claimant/appellant or debtor/appellee when
15 this appeal is heard by this district court;
- 16 (ix) Other opinions by this circuit court that could lead to the conclusion that the leave
17 to appeal should be granted.
- 18
- 19
- 20
- 21
- 22

23 Among the stated dockets herein named and filed within the Bankruptcy case No. 19-
24 30088(DM), Claimant/appellant has attached a copy of the dockets in regards to the
25 interlocutory order and related opinions. See attached Dockets 10808
26 (debtor's/appellee's omnibus objections), dockets 10809 and 10810 (declarations by
27 debtor's/appellee's council), Docket 10960 (request for order of entry by default, note
28

1 that NO service of process was filed that claimant/appellant is aware of), Docket 10980
2 (order disallowing claimant's/appellant's claim no, 87111 found in Exhibit 1A therein.
3 As found in claimant/appellant's pleadings, personal injury was not the basis of
4 claimant's/appellant's claim).
5
6

7 This notice of interlocutory appeal filed within the UNITED BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION is only
9 summarizing the facts necessary to satisfy the requirements under FRBP Rule 8004(b) .
10 Claimant/Appellant will file more definitive statements with his initial brief to be filed with the
11 United States District Court, Northern District, San Fransisco on or before November 18, 2022.
12
13

14 Dated this 14th day of October, 2022

15
16 
17 Ricky-Dear Horton, a living man
18 Claimant/Appellant



KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenuti (#60566)
(pbenvenuti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS'
NINETY-THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LEGAL LIABILITY CLAIMS)**

**Response Deadline:
July 14, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)

United States Bankruptcy Court

Courtroom 17, 16th Floor

San Francisco, CA 94102

1 **TO: (A) THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
2 **JUDGE; (B) THE OFFICE OF THE UNITED STATES TRUSTEE; (C) THE AFFECTED**
3 **CLAIMANTS; AND (D) OTHER PARTIES ENTITLED TO NOTICE:**

4 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
5 debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to
6 the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
7 “**Chapter 11 Cases**”) hereby submit this Ninety-Third Omnibus Objection (the “**Objection**”) to the
8 Proofs of Claim (as defined below) identified in the columns headed “Claims To Be Disallowed and
9 Expunged” and “Claim To Be Reduced” on **Exhibit 1** annexed hereto.

10 **I. JURISDICTION**

11 This Court has jurisdiction over this Objection under **28 U.S.C. §§ 157** and **1334**; the *Order*
12 *Referring Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.); and
13 Rule 5011-1(a) of the Bankruptcy Local Rules for the United States District Court for the Northern
14 District of California (the “**Bankruptcy Local Rules**”). This matter is a core proceeding pursuant to **28**
15 **U.S.C. § 157(b)**. Venue is proper before this Court pursuant to **28 U.S.C. §§ 1408** and **1409**. The
16 statutory predicates for the relief requested are section 502 of Title 11 of the United States Code (the
17 “**Bankruptcy Code**”) and Rule 3007 of the **Federal Rules of Bankruptcy Procedure** (the “**Bankruptcy**
18 **Rules**”).

19 **II. BACKGROUND**

20 On January 29, 2019 (the “**Petition Date**”), the Debtors commenced with the Court voluntary
21 cases under chapter 11 of the Bankruptcy Code. Prior to the Effective Date (as defined below), the
22 Debtors continued to operate their businesses and manage their properties as debtors in possession
23 pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner was appointed
24 in either of the Chapter 11 Cases. The Chapter 11 Cases are being jointly administered for procedural
25 purposes only pursuant to Bankruptcy Rule 1015(b).

26 Additional information regarding the circumstances leading to the commencement of the
27 Chapter 11 Cases and information regarding the Debtors’ businesses and capital structure is set forth in
28 the *Amended Declaration of Jason P. Wells in Support of the First Day Motions and Related Relief*
[**Docket No. 263**].

On July 1, 2019, the Court entered the *Order Pursuant to 11 U.S.C. §§ 502(b)(9) and 105(a), Fed. R. Bankr. P. 2002, 3003(c)(3), 5005, and 9007, and L.B.R. 3003-1 (I) Establishing Deadline for Filing Proofs of Claim, (II) Establishing the Form and Manner of Notice Thereof, and (III) Approving Procedures for Providing Notice of Bar Date and Other Information to All Creditors and Potential Creditors* [Docket No. 2806] (the “**Bar Date Order**”). The Bar Date Order set the deadline to file all proofs of claim (each, a “**Proof of Claim**”) in respect of any prepetition claim (as defined in section 101(5) of the Bankruptcy Code), including all claims of Fire Claimants (as defined therein), Wildfire Subrogation Claimants (as defined therein), Governmental Units (as defined in section 101(27) of the Bankruptcy Code), and Customers, and for the avoidance of doubt, including all secured claims and priority claims, against either of the Debtors as October 21, 2019, at 5:00 p.m. Pacific Time (the “**Bar Date**”). The Bar Date later was extended solely with respect to unfiled, non-governmental Fire Claimants to December 31, 2019 [Docket No. 4672]¹; and subsequently with respect to certain claimants that purchased or acquired the Debtors’ publicly held debt and equity securities and may have claims against the Debtors for rescission or damages to April 16, 2020 [Docket No. 5943].

By Order dated June 20, 2020 [Docket No. 8053], the Bankruptcy Court confirmed the *Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated June 19, 2020* (as may be further modified, amended or supplemented from time to time, and together with any exhibits or schedules thereto, the “**Plan**”). The Effective Date of the Plan occurred on July 1, 2020 (the “**Effective Date**”). See *Dkt. No. 8252*.

III. RELIEF REQUESTED

The Reorganized Debtors file this Objection, pursuant to section 502 of the Bankruptcy Code, Bankruptcy Rule 3007(d)(5), Bankruptcy Local Rule 3007-1, and the *Order Approving (A) Procedures for Filing Omnibus Objections to Claims and (B) the Form and Manner of the Notice of Omnibus Objections*, dated June 30, 2020 [Docket No. 8228] (the “**Omnibus Objections Procedures Order**”), seeking entry of an order disallowing and expunging or reducing Proofs of Claim for which the Reorganized Debtors are not liable (the “**No Legal Liability Claims**”). Exhibit 1, which identifies the

¹ The claims of Fire Claimants will be administered through the Fire Victim Trust and the claims of Wildfire Subrogation Claimants through the Subrogation Wildfire Trust in accordance with the Plan.

No Legal Liability Claims, is comprised of the following:

- **Exhibit 1A** (which are Proofs of Claim to be disallowed and expunged filed by parties who are not current or former employees of the Debtors)
- **Exhibit 1B** (which are Proofs of Claim to be disallowed and expunged filed by parties who are current or former employees of the Debtors)²
- **Exhibit 1C** (which is the Proof of Claim to be reduced).

The No Legal Liability Claims are identified in the columns headed “Claims To Be Disallowed and Expunged” in **Exhibit 1A** and **Exhibit 1B**, and “Claim to Be Reduced” in **Exhibit 1C**. **Exhibit 1** also specifically identifies in the “Basis for Objection” (including multiple bases, where applicable) that the No Legal Liability Claims are classified as any one or more of the following, as discussed further below:

1. Barred By Statute of Limitations
2. Barred By Court Order
3. Barred By Previous Settlement Agreement
4. Payroll Withholding Claims
5. Preempted By National Labor Relations Act (“NLRA”)
6. No Liability Based on Investigation

IV. ARGUMENT

A. The No Legal Liability Claims Should be Disallowed and Expunged or Reduced

The Omnibus Objections Procedures Order supplemented Bankruptcy Rule 3007(d) to permit the Reorganized Debtors to file objections to more than one claim if “[t]he claims seek recovery of amounts for which the Debtors are not liable” or “[t]he claims are objectionable on some other common basis under applicable bankruptcy or non-bankruptcy law” Omnibus Objections Procedures Order, ¶ 2(C)(iii), (vii). Bankruptcy Rule 3007(e) requires that an omnibus objection must list the claimants

² Concurrently with the filing of this Objection, the Reorganized Debtors will be seeking to redact the personally identifiable information of current and former employees. Accordingly, in the exhibits to this Objection, the Reorganized Debtors have segregated the Proofs of Claim filed by parties who are current or former employees of the Debtors from those filed by parties who are not current or former employees.

1 alphabetically and by cross-reference to claim numbers. The Reorganized Debtors and their
2 professionals have reviewed each of the No Legal Liability Claims identified on Exhibit 1 and have
3 determined, on one or more of the bases below, that each represents a Proof of Claim for which the
4 Reorganized Debtors are not liable.

5 (1) “Barred By Statute of Limitations.” These are Proofs of Claim that fail to state a legal
6 basis for recovery against the Debtors because the underlying causes of action are barred by an applicable
7 statute of limitations. Attached hereto as Exhibit 2, which is comprised of Exhibit 2A (which are Proofs
8 of Claim filed by parties who are not current or former employees of the Debtors) and Exhibit 2B (which
9 are Proofs of Claim filed by parties who are current or former employees of the Debtors), is a list of all
10 Barred By Statute of Limitations Claims, together with a citation to the applicable California or federal
11 statute, the applicable limitations period, and the date of incident for each claim (as determined from the
12 Proof of Claim and/or through investigation by the Reorganized Debtors and their professionals). The
13 claimants seek recovery from the Debtors based on allegations that include (i) personal injury,
14 (ii) property damage, (iii) breach of contract, (iv) statutory liability, including penalties or forfeitures,
15 (v) employment discrimination, and (vi) other miscellaneous causes of action. All of the Barred By
16 Statute of Limitations Claims are governed by California or federal law. Under the applicable California
17 or federal statute of limitations periods identified below, the claimants’ right to bring such claims against
18 the debtors expired prior to the Petition Date. Therefore, the Reorganized Debtors are not liable, and the
19 Barred By Statute of Limitations Claims should be reduced³ or disallowed and expunged.

- 20 a. Personal Injury – 2 years. Cal. Civ. Proc. Code § 335.1.
21 b. Damage to Real or Personal Property – 3 years. Cal. Civ. Proc. Code § 338(b) or (c).
22 c. Breach of Written Contract – 4 years. Cal. Civ. Proc. Code § 337.
23 d. Statutory Liability – 3 years. Cal. Civ. Proc. Code § 338(a).
24 e. Statutory Penalty or Forfeiture – 1 year. Cal. Civ. Proc. Code § 340(b).
25

26
27 ³ Claim No. 56868, identified on Exhibit 1C and Exhibit 2A, is the only No Legal Liability Claim that
28 the Reorganized Debtors are seeking to reduce through this Objection, as a portion of the claim based
on statutory liability is not barred by the applicable statute of limitations. All other No Legal Liability
Claims are to be disallowed and expunged in their entirety.

1 f. Employment Discrimination (California) – 1 year. Cal. Gov't Code § 12960 *et seq.*⁴

2 g. Employment Discrimination (Federal) – 300 days. 42 U.S.C. § 2000e-5.

3 h. “Catch-All” Statute – 4 years. Cal. Civ. Proc. Code § 343.

4 (2) “Barred by Court Order.” These Proofs of Claim were also asserted by the Claimants
5 and relate to prepetition litigation against the Debtors. The Reorganized Debtors are not liable for
6 these claims because they were previously disposed of pursuant to an order by a court of competent
7 jurisdiction other than the Bankruptcy Court. Therefore, the Barred By Court Order Claims should be
8 disallowed and expunged.

9 (3) “Barred by Previous Settlement Agreement.” These Proofs of Claim are each subject to
10 a valid and enforceable settlement agreement with or on behalf of the claimant that has been satisfied in
11 full by the Debtors, either in the ordinary course of business or pursuant to an order by a court of
12 competent jurisdiction other than the Bankruptcy Court. Therefore, because the Reorganized Debtors
13 have satisfied the underlying liability for these Claims pursuant to those settlement agreements, the
14 Barred By Previous Settlement Agreement Claims should be disallowed and expunged.

15 (4) “Payroll Withholding Claims.” These are Proofs of Claim for which the claimants – who
16 were current or former employees of the Debtors – dispute the Debtors’ legal authority to withhold
17 payroll taxes, and therefore oppose the Debtors’ compliance with the applicable federal and state laws
18 regarding such withholding. The Debtors are unaware of any legal basis on which such a claim can be
19 asserted. Accordingly, the Reorganized Debtors have determined they are not liable for these amounts
20 and the corresponding Proofs of Claim should be disallowed and expunged.⁵

21 (5) “Preempted by NLRA.” Each of these employment-related claims is duplicative of a
22

23 ⁴ Cal. Gov't Code § 12960 was amended after the Petition Date, in October 2019, by Assembly Bill 9,
24 which extended the period to file employment discrimination claims with the Department of Fair
25 Employment and Housing from one year to three years. The amendment does not revive lapsed
claims. All employment discrimination claims that are the subject of this Objection were time-barred
under the 1-year statute as of the Petition Date.

26 ⁵ The Reorganized Debtors are aware of the previous filings by the Payroll Withholding Claimants in
27 these Chapter 11 Cases. *See, e.g.*, Dkt. Nos. 10752, 10753, and 10754. The process for claims
28 administration in these Chapter 11 Cases is controlled by the Bankruptcy Code, Bankruptcy Rules,
Bankruptcy Local Rules, and the Orders of this Court. The question of disallowance of the Payroll
Withholding Claims is now before the Court, and the Payroll Withholding Claimants will have the
opportunity to defend their Claims by responding to this Objection.

1 grievance filed pursuant to a collective bargaining agreement, or is a claim that is required to be filed as
2 a grievance pursuant to a collective bargaining agreement, and, accordingly, these Proofs of Claim are
3 preempted by the National Labor Relations Act, pursuant to which such grievance proceedings are the
4 sole means through which the claimants may seek redress for their claims. Labor grievance proceedings
5 arising under collective bargaining agreements were not subject to the automatic stay of 11 U.S.C.
6 § 362(a) during these Chapter 11 Cases. *See Shugrue v. Airline Pilots Association, (In re Ionosphere*
7 *Clubs, Inc.)*, 922 F.2d 984, 990 (2d. Cir. 1990) (“Congress intended that the collective bargaining
8 agreement remain in effect and that the collective bargaining process continue after the filing of a
9 bankruptcy petition unless and until the debtor complies with the provisions of § 1113.”). Pursuant to
10 Section 8.6 of the Plan, the Debtors assumed the Collective Bargaining Agreements (as such term is
11 defined in the Plan), and, as such, any right the claimants may have to pursue their grievances are not
12 impacted by the Plan. Accordingly, the Reorganized Debtors have determined that the corresponding
13 Proofs of Claim should be disallowed and expunged.

14 (6) “No Liability Based on Investigation.” These are Proofs of Claim where the Reorganized
15 Debtors, after conducting a thorough review of the Proof of Claim, concluded that there is no basis for
16 liability. The Reorganized Debtors’ review of each Proof of Claim consisted of (i) a review of
17 information submitted by the Claimant in connection with the respective Proof of Claim, and (ii) an
18 investigation by PG&E of the facts alleged by the Claimant. In each instance, the Reorganized Debtors
19 determined that the claim was not valid and the investigation discovered no basis for the claim.
20 Accordingly, the Reorganized Debtors have determined they are not liable for these amounts and the
21 corresponding Proofs of Claim should be disallowed and expunged.

22 Each of the Claimants is listed alphabetically, and the claim number and amount are identified
23 in accordance with Bankruptcy Rule 3007(e). Furthermore, in accordance with the Omnibus
24 Objections Procedures Order, the Reorganized Debtors have sent individualized notices to the holders
25 of each of the No Legal Liability Claims.

26 **B. The Claimants Bear the Burden of Proof**

27

28

1 A filed proof of claim is “deemed allowed, unless a party in interest . . . objects.” 11 U.S.C.
2 § 502(a).⁶ Section 502(b)(1) of the Bankruptcy Code, however, provides in relevant part that a claim
3 may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under
4 any agreement or applicable law.” 11 U.S.C. § 502(b)(1). Once the objector raises “facts tending to
5 defeat the claim by probative force equal to that of the allegations of the proofs of claim themselves,”
6 *Wright v. Holm (In re Holm)*, 931 F.2d 620, 623 (9th Cir. 1991), quoting 3 L. King, *Collier on*
7 *Bankruptcy* § 502.02 at 502-22 (15th ed. 1991), then “the burden reverts to the claimant to prove the
8 validity of the claim by a preponderance of the evidence,” *Ashford v. Consolidated Pioneer Mortgage*
9 *(In re Consolidated Pioneer Mortgage)*, 178 B.R. 222, 226 (B.A.P. 9th Cir. 1995) (quoting *In re*
10 *Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992)), *aff’d without opinion* 91 F.3d 151 (9th Cir.
11 1996). “[T]he ultimate burden of persuasion is always on the claimant.” *Holm*, 931 F.2d at 623 (quoting
12 King, *Collier on Bankruptcy*); *see also Lundell v. Anchor Constr. Specialists, Inc.*, 223 F.3d 1035, 1039
13 (9th Cir. 2000); *Spencer v. Pugh (In re Pugh)*, 157 B.R. 898, 901 (B.A.P. 9th Cir. 1993); *In re Fidelity*
14 *Holding Co.*, 837 F.2d 696, 698 (5th Cir. 1988).

15 As set forth above, the No Legal Liability Claims assert amounts for which the Reorganized
16 Debtors are not liable and, therefore, should be disallowed and expunged in their entirety or reduced. If
17 any Claimant believes that a No Legal Liability Claim is valid, it must present affirmative evidence
18 demonstrating the validity of that claim.

19 V. RESERVATION OF RIGHTS

20 The Reorganized Debtors hereby reserve the right to object, as applicable, in the future to any of
21 the Proofs of Claim listed in this Objection on any ground, and to amend, modify, or supplement this
22 Objection to the extent an objection to a claim is not granted, and to file other objections to any proofs
23 of claims filed in these cases, including, without limitation, objections as to the amounts asserted therein,

24
25 ⁶ Upon the Reorganized Debtors’ request, the deadline under Section 7.1 of the Plan for the Reorganized
26 Debtors to bring objections to Claims initially was extended through and including June 26, 2021 (except
27 for Claims of the United States, which deadline was extended to March 31, 2021) [Docket No. 9563].
28 That deadline has been further extended through December 23, 2021, except for Claims of the California
Department of Forestry and Fire Protection, which deadline was extended to September 30, 2021,
without prejudice to the right of the Reorganized Debtors seek further extensions thereof [Docket No.
10494]. The deadline with respect to Claims of the United States has been further extended by stipulation
and order [Docket Nos. 10459, 10463].

1 or any other claims (filed or not) against the Debtors, regardless of whether such claims are subject to
2 this Objection. A separate notice and hearing will be scheduled for any such objections. Should the
3 grounds of objection specified herein be overruled, wholly or in part, the Reorganized Debtors reserve
4 the right to object to the No Legal Liability Claims on any other grounds that the Reorganized Debtors
5 may discover or deem appropriate.

6 **VI. NOTICE**

7 Notice of this Objection will be provided to (i) holders of the No Legal Liability Claims; (ii) the
8 Office of the U.S. Trustee for Region 17 (Attn: Andrew R. Vara, Esq. and Timothy Laffredi, Esq.);
9 (iii) all counsel and parties receiving electronic notice through the Court's electronic case filing system;
10 and (iv) those persons who have formally appeared in these Chapter 11 Cases and requested service
11 pursuant to Bankruptcy Rule 2002. The Reorganized Debtors respectfully submit that no further notice
12 is required. No previous request for the relief sought herein has been made by the Reorganized Debtors
13 to this or any other Court.

14 WHEREFORE the Reorganized Debtors respectfully request entry of an order granting (i) the
15 relief requested herein as a sound exercise of the Reorganized Debtors' business judgment and in the
16 best interests of their estates, creditors, shareholders, and all other parties' interests, and (ii) such other
17 and further relief as the Court may deem just and appropriate.

18 Dated: June 17, 2021

KELLER BENVENUTTI KIM LLP

19 By: /s/ Thomas B. Rupp
20 Thomas B. Rupp

21 *Attorneys for Debtors and Reorganized Debtors*

Exhibit 1A

Case: 19-30088 Doc# 10808-1 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 1 of 3

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Chipman, Warren Chipman Moroney, et al 5860 Owens Suite 410 Pittsanton, CA 94588		78834	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Court Order
City of San Carlos Gregory J. Rubens City Attorney, City of San Carlos 1001 Laurel Street Suite A San Carlos, CA 94070		68838	Pacific Gas and Electric Company	10/16/2019	\$0.00	\$0.00	\$0.00	\$1,045,280.00	\$1,045,280.00	Barred by Previous Settlement Agreement
Chan, Michael 4540 Flynn Creek Road PO Box 321 Cupertino, CA 95427		81232	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$4,947.78	\$4,947.78	Barred by Court Order
Deenvoorden, Marcus Deenvoorden Farms 19490 Hwy 99 Rd. Condonwood, CA 96022		75903	PG&E Corporation	10/18/2019	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00	Barred by Previous Settlement Agreement
Heston, Coaster 835 C" Street Apt. # 304 San Rafael, CA 94901		4457	PG&E Corporation	7/30/2019	\$0.00	\$0.00	\$12,450.00	\$2,487,550.00	\$2,500,000.00	No Liability Based on Investigation
Kis, Donald Ray Corte Maria Hillsburg, CA 94565-4121		6888	PG&E Corporation	8/13/2019	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00	Barred by Court Order
Mason Aggregates Mid-Pacific, Joseph Aidal 3000 Executive Freeway Suite 240 San Ramon, CA 94583		70657	Pacific Gas and Electric Company	10/16/2019	\$173,304.00	\$0.00	\$0.00	\$0.00	\$173,304.00	No Liability Based on Investigation
Stanton, Ricky D. 77 Rosemary Court Pittsfield, CA 94533		87111	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$50,000,000.00	\$50,000,000.00	Barred by Statute of Limitations - Personal Injury

Exhibit 1A

Case: 19-30088 Doc# 10808-1 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 2 of 3

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Motahari-Fard, Saeedeh Law Offices of Steven D. Saeedeh Motahari- Fard Sunnyvale, CA 94086		3882	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$31,576.00	\$31,576.00	Barred by Court Order
Reyes, Juan M. Leon Law Firm, APC c/o James C. Mitchell (SBN 87151) 1320 Columbia Street, Suite 200 San Diego, CA 92101		7666	PG&E Corporation	8/20/2019	\$0.00	\$0.00	\$0.00	\$4,000,000.00	\$4,000,000.00	Barred by Court Order
Rad Heydenfeldt, Agent, Rasar, on behalf of United Trust and Rad Heydenfeldt 5255 Clayton Road #210 Clayton, CA 94521		4606	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$250,000,000.00	\$250,000,000.00	Barred by Statute of Limitations - Breach of Written Contract
Richards, Darwin 78 Arbor Ave Apt 234 Hayward, CA 94541-4894		96962	PG&E Corporation	2/14/2020	\$0.00	\$0.00	\$0.00	\$969,000.00	\$969,000.00	Barred by Statute of Limitations - Breach of Written Contract
Richards, Darwin 78 Arbor Ave., Apt. 234 Hayward, CA 94541-4894		86933	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$369,000.00	\$369,000.00	Barred by Statute of Limitations - Breach of Written Contract
Shuman, Geoffrey Law Offices of Paul Aghabala & Associates, Inc. Ani Gygaladyan, Esq. 15250 Ventura Blvd Ste 500 Sunnyvale, CA 94103-3217		23522	PG&E Corporation	9/30/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Shuman, Geoffrey Prestige Law Firm, P.C. Ani Gygaladyan, Esq. P Paul Aghabala, Esq. 15250 Ventura Boulevard, Suite 500 Sunnyvale, CA 94103		105758	PG&E Corporation	6/2/2020	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation

Case: 19-30088 Doc#: 13083-1 Filed: 10/10/22 Entered: 10/10/22 22:59:06 Page 8 of 96

Case#: 19-30088 Doc# 13084-1 Filed: 10/10/2022 Entered: 10/10/2022 15:06:55 Page 36 of 756

Case#: 19-30088 Doc#: 13084-1 Filed: 10/10/22 Entered: 10/10/22 13:54:05 Page 20
376756

Redacted Version of Exhibit 1B

Case: 19-30088 Doc# 13008-1 Filed: 10/22/22 Entered: 10/22/22 15:06:58 Page 38
Case: 19-30088 Doc# 13008-2 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 39
Case: 19-30088 Doc# 13008-3 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 40
Case: 19-30088 Doc# 13008-4 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 41
Case: 19-30088 Doc# 13008-5 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 42
Case: 19-30088 Doc# 13008-6 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 43
Case: 19-30088 Doc# 13008-7 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 44
Case: 19-30088 Doc# 13008-8 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 45
Case: 19-30088 Doc# 13008-9 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 46
Case: 19-30088 Doc# 13008-10 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 47
Case: 19-30088 Doc# 13008-11 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 48
Case: 19-30088 Doc# 13008-12 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 49
Case: 19-30088 Doc# 13008-13 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 50
Case: 19-30088 Doc# 13008-14 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 51
Case: 19-30088 Doc# 13008-15 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 52
Case: 19-30088 Doc# 13008-16 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 53
Case: 19-30088 Doc# 13008-17 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 54
Case: 19-30088 Doc# 13008-18 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 55
Case: 19-30088 Doc# 13008-19 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 56
Case: 19-30088 Doc# 13008-20 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 57
Case: 19-30088 Doc# 13008-21 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 58
Case: 19-30088 Doc# 13008-22 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 59
Case: 19-30088 Doc# 13008-23 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 60
Case: 19-30088 Doc# 13008-24 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 61
Case: 19-30088 Doc# 13008-25 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 62
Case: 19-30088 Doc# 13008-26 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 63
Case: 19-30088 Doc# 13008-27 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 64
Case: 19-30088 Doc# 13008-28 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 65
Case: 19-30088 Doc# 13008-29 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 66
Case: 19-30088 Doc# 13008-30 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 67
Case: 19-30088 Doc# 13008-31 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 68
Case: 19-30088 Doc# 13008-32 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 69
Case: 19-30088 Doc# 13008-33 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 70
Case: 19-30088 Doc# 13008-34 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 71
Case: 19-30088 Doc# 13008-35 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 72
Case: 19-30088 Doc# 13008-36 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 73
Case: 19-30088 Doc# 13008-37 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 74
Case: 19-30088 Doc# 13008-38 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 75
Case: 19-30088 Doc# 13008-39 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 76
Case: 19-30088 Doc# 13008-40 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 77
Case: 19-30088 Doc# 13008-41 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 78
Case: 19-30088 Doc# 13008-42 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 79
Case: 19-30088 Doc# 13008-43 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 80
Case: 19-30088 Doc# 13008-44 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 81
Case: 19-30088 Doc# 13008-45 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 82
Case: 19-30088 Doc# 13008-46 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 83
Case: 19-30088 Doc# 13008-47 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 84
Case: 19-30088 Doc# 13008-48 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 85
Case: 19-30088 Doc# 13008-49 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 86
Case: 19-30088 Doc# 13008-50 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 87
Case: 19-30088 Doc# 13008-51 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 88
Case: 19-30088 Doc# 13008-52 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 89
Case: 19-30088 Doc# 13008-53 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 90
Case: 19-30088 Doc# 13008-54 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 91
Case: 19-30088 Doc# 13008-55 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 92
Case: 19-30088 Doc# 13008-56 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 93
Case: 19-30088 Doc# 13008-57 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 94
Case: 19-30088 Doc# 13008-58 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 95
Case: 19-30088 Doc# 13008-59 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 96
Case: 19-30088 Doc# 13008-60 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 97
Case: 19-30088 Doc# 13008-61 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 98
Case: 19-30088 Doc# 13008-62 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 99
Case: 19-30088 Doc# 13008-63 Filed: 06/17/21 Entered: 06/17/21 17:20:03 Page 100

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted	Redacted	Redacted	PG&E Corporation	10/22/2019	\$0.00	\$0.00	\$86,034.64	\$0.00	\$86,034.64	Barred by Statute of Limitations - Breach of Written Contract and Barred by Previous Settlement Agreement
Redacted	Redacted	Redacted	PG&E Corporation	8/1/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Employment Discrimination
Redacted	Redacted	Redacted	PG&E Corporation	8/12/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Breach of Written Contract and Preempted by NLRA
Redacted	Redacted	Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted	Redacted	Redacted	PG&E Corporation	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted	Redacted	Redacted	PG&E Corporation	10/7/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted	Redacted	Redacted	PG&E Corporation	10/4/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted	Redacted	Redacted	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims

Redacted Version of Exhibit 1B

Case#: 19-30088 Doc#: 13088-1 Filed: 10/10/22 Entered: 10/10/22 22:59:06 Page 2 of 56

Exhibit 1C

Principal Creditor	Claim To Be Reduced	Debtor	Date Filed:	Filed/Sched. Claim Amount:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
State of California, Department of Housing and Community Development Attention: Accounting 2020 West El Camino Ave. Sacramento, CA 95833	56868	Pacific Gas and Electric Company	10/10/2019	<div>Unliquidated <input type="checkbox"/></div> <div>Reduced Claim Amount:</div>	\$330,432.00	\$0.00	\$0.00	\$0.00	\$330,432.00	Barred by Statute of Limitations - Statutory Liability and Statutory Penalty or Forfeiture
Asserted Total					\$330,432.00	\$0.00	\$0.00	\$0.00	\$330,432.00	
Remaining Total					\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00	

Exhibit 2A

Claims Barred by Statute of Limitations

Original Creditor	Claims	Applicable Statute of Limitations	Limitation Period	Incident Date
Morton, Ricky D.	87111	Personal Injury (Cal. Civ. Proc. Code § 335.1)	2 years	9/5/2016
Tad Heydenfeldt, Agent, Rasar, Inc on behalf of United Trust Fund	4606	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1993
Richards, Darwin	86933	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1998-2000
Richards, Darwin	96962	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1998-2000
State of California, Department of Housing and Community Development	56868	Statutory Liability (Cal. Code Civ. Proc. § 338(a)) and Statutory Penalty or Forfeiture (Cal. Civ. Proc. Code § 340(b))	3 years and 1 year	1998 -2018
Vitus, Leona A	86900	Personal Injury (Cal. Civ. Proc. Code § 335.1)	2 years	10/10/1989
Yodonick, John	19917	Damage to Real or Personal Property (Cal. Civ. Proc. Code § 338(b) or (c))	3 years	1988

Redacted Version of Exhibit 2B
Claims Barred by Statute of Limitations

Original Creditor	Claims	Applicable Statute of Limitations	Limitation Period	Incident Date
Redacted	Redacted	Personal Injury (Cal. Civ. Proc. Code § 335.1)	2 years	1997 - 1999
Redacted	Redacted	"Catch-all" Statute (Cal. Civ. Proc. Code § 343)	4 years	1992
Redacted	Redacted	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	2010
Redacted	Redacted	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1999-2000
Redacted	Redacted	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1999-2000
Redacted	Redacted	Employment Discrimination California (Cal. Gov't Code § 12960 et seq.) and Federal (42 U.S.C. § 2000e-5)	1 year and 300 days	5/13/2016
Redacted	Redacted	Breach of Written Contract (Cal. Civ. Proc. Code § 337)	4 years	1996

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF A. ANNA CAPELLE IN
SUPPORT OF REORGANIZED DEBTORS'
NINETY-THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LEGAL LIABILITY CLAIMS)**

**Response Deadline:
July 14, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, A. Anna Capelle, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as a Managing Counsel, Litigation and Commercial Contracts, in the Law
5 Department of Pacific Gas and Electric Company (the “**Utility**”), a wholly-owned subsidiary of PG&E
6 Corporation (“**PG&E Corp.**”) and together with Utility, the “**Reorganized Debtors**” in the above-
7 captioned chapter 11 cases (the “**Chapter 11 Cases**”). I have been employed in this role since May 1,
8 2020, and prior to such date I was employed as Interim Managing Counsel, Strategy and Policy. I have
9 been employed as an attorney for PG&E since October 2006. In my current role, I am responsible for
10 supervising seven litigation attorneys, and advising leaders on litigation and general dispute issues. I
11 also regularly consult with my colleagues elsewhere in the Utility’s Law Department on legal issues that
12 cover a variety of other subject matter. I submit this Declaration in support of the *Reorganized Debtors’*
13 *Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims)* (the “**Omnibus Objection**”),¹
14 filed contemporaneously herewith, with respect to the claims listed on Exhibits 1A, 1C, and 2A to the
15 Omnibus Objection.²

16 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
17 my personal knowledge, the knowledge of other personnel of the Reorganized Debtors working under
18 and alongside me on this matter, including my colleagues elsewhere in the Utility’s Law Department,
19 my discussions with PG&E’s professionals and various other advisors and counsel, and my review and
20 my colleagues’ review of relevant documents and information. If called upon to testify, I would testify
21 competently to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf
22 of the Reorganized Debtors.

23 3. The Omnibus Objection is directed at Proofs of Claim specifically identified in **Exhibit 1**
24 to the Omnibus Objection, which is comprised of the following:

25 _____
26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

27 ² I understand that the Proofs of Claim set forth on Exhibits 1B and 2B to the Omnibus Objection are
28 supported by the Declaration of Stacy Campos that is being submitted concurrently with this
Declaration, and they are not the subject of this Declaration.

- 1 a. **Exhibit 1A** (which are Proofs of Claim to be disallowed and expunged filed by
2 parties who are not current or former employees of the Debtors)
- 3 b. **Exhibit 1B** (which are Proofs of Claim to be disallowed and expunged filed by
4 parties who are current or former employees of the Debtors)
- 5 c. **Exhibit 1C** (which is the Proof of Claim to be reduced)
- 6 4. The No Legal Liability Claims that are the subject of this Declaration are identified in the
7 columns headed “Claims To Be Disallowed and Expunged” in **Exhibit 1A**, and “Claim to Be Reduced”
8 in **Exhibit 1C**.
- 9 5. **Exhibit 1A**, **Exhibit 1C**, and **Exhibit 2A** were prepared by the AlixPartners, LLP
10 (“**AlixPartners**”) team charged with the Bankruptcy Case Management component of AlixPartners’
11 assignment to assist the Reorganized Debtors from information provided by me, and I have reviewed
12 them to confirm their accuracy. I am familiar with them, their contents, and the process under which
13 they were prepared. To the best of my knowledge, information and belief, **Exhibit 1A** and **Exhibit 1C**
14 accurately identify the No Legal Liability Claims, and **Exhibit 2A** accurately identifies the Barred By
15 Statute of Limitations Claims described in Paragraph 6(a) below.
- 16 6. **Exhibit 1A** and **Exhibit 1C** specifically identify in the “Basis for Objection” (including
17 multiple bases, where applicable) that the No Legal Liability Claims are classified as any one or more
18 of the following:
- 19 a. “**Barred By Statute of Limitations.**” These are Proofs of Claim that fail to state a
20 legal basis for recovery against the Debtors because the underlying causes of action are barred by an
21 applicable statute of limitations. Attached as **Exhibit 2A** to the Omnibus Objection, which is comprised
22 of Proofs of Claim filed by parties who are not current or former employees of the Debtors, is a list of
23 Barred By Statute of Limitations Claims, together with a citation to the applicable section of the
24 California Code of Civil Procedure, the applicable limitations period, and the date of incident for each
25 claim (as determined from the Proof of Claim and/or through investigation by the Reorganized Debtors
26 and their professionals). The claimants seek recovery from the Debtors based on allegations that include
27 (i) personal injury, (ii) property damage, (iii) breach of contract, and (iv) statutory liability, including
28 penalties or forfeitures. All of the Barred By Statute of Limitations Claims included in **Exhibit 2A** are

1 governed by California law. Under the applicable California statute of limitations periods identified
2 below, the claimants' right to bring such claims against the Debtors expired prior to the Petition Date.
3 Therefore, the Reorganized Debtors are not liable, and the Barred By Statute of Limitations Claims
4 identified on Exhibits 1A, 1C, and 2A should be disallowed and expunged or reduced.³

5 (1) Personal Injury – 2 years. Cal. Civ. Proc. Code § 335.1.

6 (2) Damage to Real or Personal Property – 3 years. Cal. Civ. Proc. Code § 338(b)
7 or (c).

8 (3) Breach of Written Contract – 4 years. Cal. Civ. Proc. Code § 337.

9 (4) Statutory Liability – 3 years. Cal. Civ. Proc. Code § 338(a).

10 (5) Statutory Penalty or Forfeiture – 1 year. Cal. Civ. Proc. Code § 340(b).

11 b. "Barred by Court Order." These Proofs of Claim were also asserted by the
12 Claimants and relate to prepetition litigation against the Debtors. The Reorganized Debtors are not liable
13 for these claims because they were previously disposed of pursuant to an order by a court of competent
14 jurisdiction other than the Bankruptcy Court. Therefore, the Barred By Court Order Claims identified
15 on Exhibit 1A should be disallowed and expunged.

16 c. "Barred by Previous Settlement Agreement." These Proofs of Claim are each
17 subject to a valid and enforceable settlement agreement with or on behalf of the claimant that has been
18 satisfied in full by the Debtors, either in the ordinary course of business or pursuant to an order by a
19 court of competent jurisdiction other than the Bankruptcy Court. Therefore, because the Reorganized
20 Debtors have satisfied the underlying liability for these Claims pursuant to those settlement agreements,
21 the Barred By Previous Settlement Agreement Claims identified on Exhibit 1A should be disallowed
22 and expunged.

23 d. "No Liability Based on Investigation." These are Proofs of Claim where the
24 Reorganized Debtors, after conducting a thorough review of the Proof of Claim, concluded that there is
25 no basis for liability. The Reorganized Debtors' review of each Proof of Claim consisted of (i) a review

26 ³ Claim No. 56868, identified on Exhibit 1C and Exhibit 2A, is the only No Legal Liability Claim that
27 the Reorganized Debtors are seeking to reduce through the Omnibus Objection, as a portion of the
28 claim based on statutory liability is not barred by the applicable statute of limitations. All other No
Legal Liability Claims are to be disallowed and expunged in their entirety.

1 of information submitted by the Claimant in connection with the respective Proof of Claim, and (ii) an
2 investigation by PG&E of the facts alleged by the Claimant. In each instance, the Reorganized Debtors
3 determined that the claim was not valid and the investigation discovered no basis for the claim.
4 Accordingly, the Reorganized Debtors have determined they are not liable for these amounts and the
5 corresponding No Liability Based on Investigation Claims identified on Exhibit 1A should be
6 disallowed and expunged.

7 7. Based on the Reorganized Debtors' and their professionals' review of the Reorganized
8 Debtors' books and records and my team's consultations with the Reorganized Debtors' personnel and
9 restructuring professionals, each of the No Legal Liability Claims identified on Exhibit 1A represents a
10 Proof of Claim for which the Reorganized Debtors are not liable and, therefore, should be disallowed
11 and expunged in their entirety.

12 8. Based on the Reorganized Debtors' and their professionals' review of the Reorganized
13 Debtors' books and records and my team's consultations with the Reorganized Debtors' personnel and
14 restructuring professionals, the No Legal Liability Claim identified on Exhibit 1C represents a Proof of
15 Claim for which the Reorganized Debtors are partially not liable because the applicable statute of
16 limitations bars part of the claim, and, therefore, that Proof of Claim should be reduced as set forth on
17 Exhibit 1C.

18 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
19 correct to the best of my knowledge, information, and belief. Executed this fifteenth day of June, 2021.

20 /s/ A. Anna Capelle
21 A. Anna Capelle
22
23
24
25
26
27
28

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenuti (#60566)
(pbenvenuti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**DECLARATION OF STACY CAMPOS IN
SUPPORT OF REORGANIZED DEBTORS'
NINETY-THIRD OMNIBUS OBJECTION TO
CLAIMS (NO LEGAL LIABILITY CLAIMS)**

**Response Deadline:
July 14, 2021, 4:00 p.m. (PT)**

Hearing Information If Timely Response Made:

Date: July 28, 2021

Time: 10:00 a.m. (Pacific Time)

Place: (Telephonic Appearances Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 I, Stacy Campos, pursuant to section 1746 of title 28 of the United States Code, hereby declare
2 under penalty of perjury that the following is true and correct to the best of my knowledge, information,
3 and belief:

4 1. I am employed as a Managing Counsel, Employment, Labor and Workers'
5 Compensation, in the Law Department of Pacific Gas and Electric Company (the "**Utility**"), a wholly-
6 owned subsidiary of PG&E Corporation ("**PG&E Corp.**") and together with Utility, the "**Reorganized**
7 **Debtors**" in the above-captioned chapter 11 cases (the "**Chapter 11 Cases**"). In my current role, I am
8 responsible for supervising three employment and labor attorneys, and advising leaders on human
9 resource and labor issues. I also regularly consult with my colleagues elsewhere in the Utility's Law
10 Department on legal issues that cover a variety of other subject matter. I submit this Declaration in
11 support of the *Reorganized Debtors' Ninety-Third Omnibus Objection to Claims (No Legal Liability*
12 *Claims)* (the "**Omnibus Objection**"),¹ filed contemporaneously herewith, with respect to the claims
13 listed on Exhibits 1B and 2B to the Omnibus Objection.²

14 2. Except as otherwise indicated herein, all facts set forth in this Declaration are based upon
15 my personal knowledge, the knowledge of other personnel of the Reorganized Debtors working under
16 and alongside me on this matter, including my colleagues elsewhere in the Utility's Law Department,
17 my discussions with PG&E's professionals and various other advisors and counsel, and my review and
18 my colleagues' review of relevant documents and information. If called upon to testify, I would testify
19 competently to the facts set forth in this Declaration. I am authorized to submit this declaration on behalf
20 of the Reorganized Debtors.

21 3. The Omnibus Objection is directed at Proofs of Claim specifically identified in **Exhibit 1**
22 to the Omnibus Objection, which is comprised of the following:

- 23 a. **Exhibit 1A** (which are Proofs of Claim to be disallowed and expunged filed by
24 parties who are not current or former employees of the Debtors)

25
26 ¹ Capitalized terms used but not otherwise defined herein have the meanings ascribed to such terms in
the Omnibus Objection.

27 ² I understand that the Proofs of Claim set forth on Exhibits 1A, 1C, and 2A to the Omnibus Objection
28 are supported by the Declaration of A. Anna Capelle that is being submitted concurrently with this
Declaration, and they are not the subject of this Declaration.

1 b. **Exhibit 1B** (which are Proofs of Claim to be disallowed and expunged filed by
2 parties who are current or former employees of the Debtors)

3 c. **Exhibit 1C** (which is the Proof of Claim to be reduced)

4 4. The No Legal Liability Claims that are the subject of this Declaration are identified in the
5 columns headed “Claims To Be Disallowed and Expunged” in **Exhibit 1B**.

6 5. **Exhibit 1B** and **Exhibit 2B** were prepared by the AlixPartners, LLP (“**AlixPartners**”) team charged with the Bankruptcy Case Management component of AlixPartners’ assignment to assist
7 the Reorganized Debtors from information provided by me, and I have reviewed them to confirm their
8 accuracy. I am familiar with them, their contents, and the process under which they were prepared. To
9 the best of my knowledge, information and belief, **Exhibit 1B** accurately identifies the No Legal
10 Liability Claims, and **Exhibit 2B** accurately identifies the Barred By Statute of Limitations Claims
11 described in Paragraph 6(a) below.

12 6. **Exhibit 1B** specifically identifies in the “Basis for Objection” (including multiple bases,
13 where applicable) that the No Legal Liability Claims are classified as any one or more of the following:

14 a. “**Barred By Statute of Limitations.**” These are Proofs of Claim that fail to state a
15 legal basis for recovery against the Debtors because the underlying causes of action are barred by an
16 applicable statute of limitations. Attached as **Exhibit 2B** to the Omnibus Objection, which is comprised
17 of Proofs of Claim filed by parties who are current or former employees of the Debtors, is a list of Barred
18 By Statute of Limitations Claims, together with a citation to the applicable California or federal statute,
19 the applicable limitations period, and the date of incident for each claim (as determined from the Proof
20 of Claim and/or through investigation by the Reorganized Debtors and their professionals). The
21 claimants seek recovery from the Debtors based on allegations that include (i) personal injury, (ii) breach
22 of contract, (iii) employment discrimination, and (iv) other miscellaneous causes of action. All of the
23 Barred By Statute of Limitations Claims are governed by California or federal law. Under the applicable
24 California or federal statute of limitations periods identified below, the claimants’ right to bring such
25 claims against the Debtors expired prior to the Petition Date. Therefore, the Reorganized Debtors are
26 not liable, and the Barred By Statute of Limitations Claims identified on **Exhibits 1B** and **2B** should be
27 disallowed and expunged.
28

- (1) Personal Injury – 2 years. Cal. Civ. Proc. Code § 335.1.
- (2) Breach of Written Contract – 4 years. Cal. Civ. Proc. Code § 337.
- (3) Employment Discrimination (California) – 1 year. Cal. Gov't Code § 12960 *et seq.*³
- (4) Employment Discrimination (Federal) – 300 days. 42 U.S.C. § 2000e-5.
- (5) “Catch-All” Statute – 4 years. Cal. Civ. Proc. Code § 343.

b. “Barred by Court Order.” These Proofs of Claim were also asserted by the Claimants and relate to prepetition litigation against the Debtors. The Reorganized Debtors are not liable for these claims because they were previously disposed of pursuant to an order by a court of competent jurisdiction other than the Bankruptcy Court. Therefore, the Barred By Court Order Claims identified on Exhibit 1B should be disallowed and expunged.

c. “Barred by Previous Settlement Agreement.” These Proofs of Claim are each subject to a valid and enforceable settlement agreement with or on behalf of the claimant that has been satisfied in full by the Debtors, either in the ordinary course of business or pursuant to an order by a court of competent jurisdiction other than the Bankruptcy Court. Therefore, because the Reorganized Debtors have satisfied the underlying liability for these Claims pursuant to those settlement agreements, the Barred By Previous Settlement Agreement Claims identified on Exhibit 1B should be disallowed and expunged.

d. “Payroll Withholding Claims.” These are Proofs of Claim for which the claimants – who were current or former employees of the Debtors – dispute the Debtors’ legal authority to withhold payroll taxes, and therefore oppose the Debtors’ compliance with the applicable federal and state laws regarding such withholding. The Debtors are unaware of any legal basis on which such a claim can be asserted. Accordingly, the Reorganized Debtors have determined they are not liable for these amounts and the corresponding Payroll Withholding Claims identified on Exhibit 1B should be disallowed and

³ Cal. Gov’t Code § 12960 was amended after the Petition Date, in October 2019, by Assembly Bill 9, which extended the period to file employment discrimination claims with the Department of Fair Employment and Housing from one year to three years. The amendment does not revive lapsed claims. All employment discrimination claims that are the subject of this Objection were time-barred under the 1-year statute as of the Petition Date.

1 expunged.

2 e. “Preempted by NLRA.” Each of these employment-related claims is duplicative
3 of a grievance filed pursuant to a collective bargaining agreement, or is a claim that is required to be
4 filed as a grievance pursuant to a collective bargaining agreement, and, accordingly, these Proofs of
5 Claim are preempted by the National Labor Relations Act (“NLRA”), pursuant to which such grievance
6 proceedings are the sole means through which the claimants may seek redress for their claims. Labor
7 grievance proceedings arising under collective bargaining agreements were not subject to the automatic
8 stay of **11 U.S.C. § 362(a)** during these Chapter 11 Cases. Pursuant to Section 8.6 of the Plan, the
9 Debtors assumed the Collective Bargaining Agreements (as such term is defined in the Plan), and, as
10 such, any right the claimants may have to pursue their grievances are not impacted by the Plan.
11 Accordingly, the Reorganized Debtors have determined that the corresponding Preempted by NLRA
12 Claims identified on **Exhibit 1B** should be disallowed and expunged.

13 7. Based on the Reorganized Debtors’ and their professionals’ review of the Reorganized
14 Debtors’ books and records and my team’s consultations with the Reorganized Debtors’ personnel and
15 restructuring professionals, each of the No Legal Liability Claims identified on **Exhibit 1B** represents a
16 Proof of Claim for which the Reorganized Debtors are not liable and, therefore, should be disallowed
17 and expunged in their entirety.

18 Pursuant to **28 U.S.C. § 1746**, I declare under penalty of perjury that the foregoing is true and
19 correct to the best of my knowledge, information, and belief. Executed this twelfth day of June, 2021.

20
21
22 /s/ Stacy Campos
Stacy Campos
23
24
25
26
27
28

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

Attorneys for Debtors and Reorganized Debtors

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case, No.
19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO EIGHTY-EIGHTH
THROUGH NINETY-SIXTH OMNIBUS
OBJECTIONS TO CLAIMS AND REQUEST
FOR ORDERS BY DEFAULT AS TO
UNOPPOSED OBJECTIONS**

**[Re: Dkt. Nos. 10792, 10795, 10799, 10802,
10805, 10808, 10812, 10815, and 10819]**

**Regarding Objections Set for Hearing
July 28, 2021, at 10:00 a.m. (Pacific Time)**

REQUEST FOR ENTRY OF ORDER BY DEFAULT

PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court enter orders by default on the following omnibus claims objections (collectively, the “**Omnibus Objections**”):

Docket Number	Omnibus Objection
10792	<i>Reorganized Debtors’ Eighty-Eighth Omnibus Objection to Claims (Hinkley No Liability Claims)</i> (the “ Eighty-Eighth Omnibus Objection ”)
10795	<i>Reorganized Debtors’ Eighty-Ninth Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Eighty-Ninth Omnibus Objection ”)
10799	<i>Reorganized Debtors’ Ninetieth Omnibus Objection to Claims (No Liability Claims)</i> (the “ Ninetieth Omnibus Objection ”)
10802	<i>Reorganized Debtors’ Ninety-First Omnibus Objection to Claims (Customer No Liability Energy Rate Claims)</i> (the “ Ninety-First Omnibus Objection ”)
10805	<i>Reorganized Debtors’ Ninety-Second Omnibus Objection to Claims (Satisfied Claims)</i> (the “ Ninety-Second Omnibus Objection ”)
10808	<i>Reorganized Debtors’ Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims)</i> (the “ Ninety-Third Omnibus Objection ”)
10812	<i>Reorganized Debtors’ Ninety-Fourth Omnibus Objection to Claims (Amended and Superseded Claims)</i> (the “ Ninety-Fourth Omnibus Objection ”)
10815	<i>Reorganized Debtors’ Ninety-Fifth Omnibus Objection to Claims (Plan Passthrough Claims)</i> (the “ Ninety-Fifth Omnibus Objection ”)
10819	<i>Reorganized Debtors’ Ninety-Sixth Omnibus Objection to Claims (Customer No Liability / Passthrough Claims)</i> (the “ Ninety-Sixth Omnibus Objection ”)

RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS

The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

NOTICE AND SERVICE

The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection [Docket Nos. 10794, 10798, 10801, 10804, 10807, 10811, 10814, 10818, and 10821]. The Omnibus Objections also were supported by the respective declarations of Robb McWilliams [Docket Nos. 10796, 10800, 10803, 10806, 10813, and 10820], Matthew Dudley [Docket No. 10793], A. Anna Capelle [Docket No. 10809], Stacy Campos [Docket No. 10810], Stephen George [Docket No. 10816], and David Kraska [Docket No. 10817]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as described in the *Certificate of Service of Alain B. Francoeur*, filed on June 28, 2021 [Docket No. 10867], each holder of a claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors' objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Ninety-Third Omnibus Objection			
10907	Duivenvoorden, Marcus	75903	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.
10919	Chappell, Lamont	9946	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
10918	California Department of Housing and Community Development	56868	This matter has been continued to the September 14, 2021 Omnibus Hearing.
Informal	City of San Carlos	68838	This matter has been continued to the August 10, 2021 Omnibus Hearing.

Docket No.	Claimant	Claim No.	Resolution
10946	Richards, Darwin	86933 96962	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
Ninety-Fourth Omnibus Objection			
10895	Asplundh Construction, LLC	17001	The Claimant filed a statement of no opposition. The Ninety-Fourth Omnibus Objection is SUSTAINED with respect to this claim.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors.

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.

3. This declaration was executed in Sunnyvale, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders disallowing and/or expunging the Proofs of Claim listed in **Exhibit 1**¹ to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

Dated: July 21, 2021

KELLER BENVENUTTI KIM LLP

By: /s/ Thomas B. Rupp
Thomas B. Rupp

Attorneys for Debtors and Reorganized Debtors

¹ The portions of **Exhibit 1** listing Claims to be expunged pursuant to the Eighty-Ninth Omnibus Objection, Ninety-Third Omnibus Objection, and Ninety-Fifth Omnibus Objection have been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors' Omnibus Objections to Claims*, entered on June 21, 2021 [**Docket No. 10832**]. Unredacted versions for the Court's review will be filed under seal.

Exhibit 1

Case: 19-30088 Doc# 19-30088-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 1 of 27

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Blawiey, Kimberly 3333 Anderson Avenue Hinkley, CA 92311		529	PG&E Corporation	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Blowney, Kimberly 3333 Anderson Avenue Hinkley, CA 92311		8285	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Blawiey, Kimberly 3333 Anderson Avenue Hinkley, CA 92311		33	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Carolyn PO Box 363 Hinkley, CA 92347		7199	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Carolyn 10110 Lenwood Rd. Hinkley, CA 92347		453	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Carolyn 10110 Lenwood Rd. Hinkley, CA 92347		44	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Lynette 3330 Tobacco Rd Hinkley, CA 92347		7185	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Ronald Sandra L. Brown 42750 Orchid Hinkley, CA 92347		7374	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Sandra L PO Box 192 Hinkley, CA 92347		488	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Blawn, Sandra L PO Box 192 Hinkley, CA 92347		7200	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 10960-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 2
Case: 19-30088 Doc# 10960-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 2
58

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Brown, Sandra L. 2550 Orchard Road Hinkley, CA 92347		39	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Carrera, Agustin 800 Gina Ct . Tulare, CA 91784		7244	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Carrera, Agustin 800 Gina Ct Tulare, CA 91784		24	Pacific Gas and Electric Company	1/30/2019	\$0.00	\$0.00	\$700,000.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Carrera, Agustin 800 Gina Ct Tulare, CA 91784		491	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Christison, Joel 1010 A. Christison PO Box 9048 Loma, CA 91701		7657	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Christison, Joel A. Box 9048 Loma, CA 91701		38	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Christison, Joel A. Box 9048 Loma, CA 91701		534	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Courtney, Clell Janie Courtney Barstow, CA 92311		479	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Courtney, Clell Janie Courtney 25595 Ash Rd Barstow, CA 92311		7585	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Courtney, Clell Janie Courtney 25595 Ash Rd Barstow, CA 92311		7652	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims

Case# 19-30088 Doc# 13084-1 Filed 10/14/22 Entered 10/17/22 23:54:06 Page 2
50 of 56

Case: 19-30088 Doc# 19-30088-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 4
606756

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Garza, Martin 2030 Tobacco Rd Hinkley, CA 92347		46	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Garza, Martin 2030 Tobacco Rd Hinkley, CA 92347		487	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Garza, Martin 2030 Tobacco Rd Hinkley, CA 92347		7183	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		477	PG&E Corporation	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		3	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		8274	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		8277	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		7176	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		25	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Halstead, Norman 2055 Halstead Road Hinkley, CA 92347		526	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 10960-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 5

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Holcroft, Shirley Shirley V. Cabrera PO Box HD Helendale, CA 92312		7171	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Holcroft, Shirley PO Box HD Helendale, CA 92312		490	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Holcroft, Shirley PO Box 80 Brown Ranch Road Helendale, CA 92347		48	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Jenkins, Darlene PO Box 376 Helendale, CA 92347		7276	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Jenkins, Darlene Herring PO Box 376 Friends Street Helendale, CA 92347		26	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Jenkins, Darlene Herring PO Box 376 Friends Street Helendale, CA 92347		528	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Jenkins, Darlene Herring PO Box 376 Friends Street Helendale, CA 92347		7264	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Jinan, Aurang Jinan, Aurang Zaib; Zahib, Jinima 1969 East Cooley Avenue San Bernardino, CA 92408		7083	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Jinan, Aurang Zaib PO Box 9 East Cooley Ave San Bernardino, CA 92408		47	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Quattrick, Yvonne 28484 Rodeo Rd Helendale, CA 92342		519	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 19-30088-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 6

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Kirkpatrick, Yvonne 3084 Rodeo Rd Hendale, CA 92342		4	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Kirkpatrick, Yvonne 3084 Rodeo Road Hendale, CA 92342		72162	PG&E Corporation	10/16/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Martinez, Juliana 3333 Hidden River Rd. Hinkley, CA 92347		7228	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Martinez, Juliana 3333 Hidden River Rd. Hinkley, CA 92347		502	PG&E Corporation	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Martinez, Juliana 3333 Hidden River Rd. Hinkley, CA 92347		23	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Martinez, Manuel 3333 Hidden River Road Hinkley, CA 92347		7375	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, Charles Issue Mathiesen 36771 Hidden River Road Hinkley, CA 92347		8273	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, Charles Issue Mathiesen Hinkley, CA 92347		482	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, Charles Issue Mathiesen Hinkley, CA 92347		6	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, Charles Issue Mathiesen Hinkley, CA 92347		8272	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 113006-1 Filed: 10/10/20 Entered: 10/10/20 23:59:00 Page 63 of 56

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Mathiesen, David 2009 Hidden River Road Hinkley, CA 92347		7229	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, David 2009 Hidden River Road Hinkley, CA 92347		5	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Mathiesen, David 2009 Hidden River Road Hinkley, CA 92347		480	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Miller, Robert 641 Sycamore Street Hinkley, CA 92347		500	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Miller, Robert 1000 Anna Learmont 37241 Sycamore Street Hinkley, CA 92347		7168	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Miller, Robert 641 Sycamore Street Hinkley, CA 92347		2	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Cashery, Herbert 1084 Rodeo Rd Piedmont, CA 92342		72139	PG&E Corporation	10/16/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Chao, Ken 241 South Curtis Avenue Alhambra, CA 91801		7167	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Chao, Ken 241 South Curtis Avenue Alhambra, CA 91801		16	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Chao, Ken 244 South Curtis Avenue Alhambra, CA 91801		525	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 113008-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 8

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Ornelas, Jose 1884 Pacific St Hesperia, CA 92345		7226	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Jose 1884 Pacific St Hesperia, CA 92345		493	PG&E Corporation	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Jose Manendez, Rosalba 18284 Pacific Street Hesperia, CA 92345		7237	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Jose 1884 Pacific St Hesperia, CA 92345		41	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Nick 333 Anderson Avenue Hastow, CA 92311		7704	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Nick 333 Anderson Avenue Hastow, CA 92311		530	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, Nick 333 Anderson Avenue Hastow, CA 92311		45	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, John 3006 Pueblo Road Hinkley, CA 92347		497	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, John 3006 Pueblo Road Hinkley, CA 92347		7072	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Ornelas, John 38006 Pueblo Road Hinkley, CA 92347		8	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 13368 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 9

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Riebeling, Adolfo Riebeling, Adolfo; Riebeling, Guadalupe 4600 Jerry Avenue Baldwin Park, CA 91706		7301	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Riebeling, Adolfo 4600 Jerry Ave. Baldwin Park, CA 91706		518	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Riebeling, Adolfo 4600 Jerry Ave. Baldwin Park, CA 91706		27	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Suarez, Victor Ray Ordaz Wilmington, CA 90744		8284	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Suarez, Victor Ray Ordaz 1042 E. Sandison St. Louis, Mo, Apt. 1 Wilmington, CA 90744		8280	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Suarez, Victor Ray Ordaz Wilmington, CA 90744		499	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Suarez, Victor Ray Ordaz Wilmington, CA 90744		42	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Suarez, Victor Ray Ordaz Wilmington, CA 90744		8283	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Guadalupe, Oscar 1077 Slauson Avenue Baldwin Park, CA 90270		43	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims

Exhibit 1

Case: 19-30088 Doc# 113006-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 10

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Williams, Oscar 3677 Slauson Avenue Newwood, CA 90270		527	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Urbina, Oscar 3677 Slauson Avenue Newwood, CA 90270		7180	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Vinson, Barbara David K. Vinson PO Box 2552 Redwood, CA 92312		7201	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Vinson, Barbara A. 3627 Hinkley Rd. Hinkley, CA 92347		40	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Vinson, Barbara A. PO Box 2552 Redwood, CA 92312		593	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Williams, Daniel Williams, Andrea 36796 Hillview Road Hinkley, CA 92347		7175	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$700,000.00	\$700,000.00	Hinkley No Liability Claims
Williams, Daniel S. 36796 Hillview Road Hinkley, CA 92347		524	Pacific Gas and Electric Company	2/12/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Williams, Daniel S. 36796 Hillview Road Hinkley, CA 92347		22	Pacific Gas and Electric Company	1/30/2019	\$700,000.00	\$0.00	\$0.00	\$0.00	\$700,000.00	Hinkley No Liability Claims
Claims To Be Expunged Totals					\$36,400,000.00	\$0.00	\$0.00	\$700,000.00	\$30,100,000.00	\$67,200,000.00

Redacted Version of Exhibit 1

In re: PG&E Corporation and Pacific Gas and Electric Company
Case No 19-30088 Jointly Administered

Principal Creditor	Claim To Be Reduced or Disallowed	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Adstra Technologies LLC 10000 Westport Plaza, Suite 500 St. Louis, MO 63146	8465	Pacific Gas and Electric Company	9/3/2019	\$0.00	\$0.00	\$0.00	\$139,020.79	\$139,020.79	Books and Records
				Unliquidated <input type="checkbox"/>					
				Reduced Claim Amount:	\$0.00	\$0.00	\$19,740.79	\$19,740.79	
Centuris Property Casualty Company-- Mark Susson Commerce & Industry Insurance Company Mark Susson 2 Corporate Plaza Drive Suite 275 Westport Beach, CA 92660	80646	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$138,444.69	\$138,444.69	Books and Records
				Unliquidated <input checked="" type="checkbox"/>					
				Reduced Claim Amount:	\$0.00	\$0.00	\$0.00	\$0.00	
Centuris Property Casualty Company-- Mark Susson Commerce & Industry Insurance Company Mark Susson Westport Beach, CA 92660	27378	Pacific Gas and Electric Company	10/9/2019	\$0.00	\$0.00	\$0.00	\$138,444.69	\$138,444.69	Books and Records
				Unliquidated <input checked="" type="checkbox"/>					
				Reduced Claim Amount:	\$0.00	\$0.00	\$0.00	\$0.00	
	Redacted	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$7,208.20	\$7,208.20	Books and Records
				Unliquidated <input type="checkbox"/>					
				Reduced Claim Amount:	\$0.00	\$0.00	\$0.00	\$0.00	

Inserted Total	Count: 4	\$0.00	\$0.00	\$0.00	\$423,118.37	\$423,118.37
Remaining Total		\$0.00	\$0.00	\$0.00	\$19,740.79	\$19,740.79

Case# 19930088 Doc# 13084 Filed 10/10/2022 Entered 10/10/2022 15:06:58 Page 51

Exhibit 1

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Golden Bay Fence Plus Iron Works, Inc. Nicholas Chavez 4104 South B Street 983 University Ave., Ste. 900 Stockton, CA 95206		7701	PG&E Corporation	8/22/2019	\$563,548.82	\$77,616.90	\$0.00	\$0.00	\$641,165.72	No Liability Subcontractor Claims
Gonzalez, Sergio 9077 Durness Way Sacramento, CA 95829-1546		8160	PG&E Corporation	9/1/2019	\$0.00	\$0.00	\$0.00	\$539.62	\$539.62	Miscellaneous No Liability Claims
Gray Thompson & Sons Painting, LLC 311mm St St. Rafael, CA 94901-5414		8720	Pacific Gas and Electric Company	9/11/2019	\$0.00	\$0.00	\$0.00	\$20,948.66	\$20,948.66	No Liability Subcontractor Claims
Hargrum Sr, Daryl D 11103 Ave Oakland, CA 94603		80888	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$100,000.00	\$100,000.00	\$200,000.00	Miscellaneous No Liability Claims
Guire and Hester John Carone, Esq. 2810 Harbor Bay Parkway 777 Cuesta Drive, Suite 200 Fremont, CA 94502		71009	Pacific Gas and Electric Company	10/21/2019	\$2,307,850.55	\$0.00	\$0.00	\$0.00	\$2,307,850.55	No Liability Subcontractor Claims
Greenwide Center LLC Jenny Tang Oceanwide Center 1000 C 88 1st Street, 6th Floor 32nd Floor San Francisco, CA 94105		64107	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$0.00	\$1,805,397.00	\$1,805,397.00	Protective Claims
ROBERT CAREY SLIGER X JAN ACCOUNT PO BOX 431 FAGE, WA 98330		4178	Pacific Gas and Electric Company	7/31/2019	\$0.00	\$0.00	\$0.00	\$200,000.00	\$200,000.00	Settlement No Liability
Sanjano County Texas Street Oakfield, CA 94533		87909	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$4,427,466.00	\$4,427,466.00	Rule 20A Claims

Case: 19-30088 Doc#: 13006-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 2

Exhibit 1

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
City of Portola Valley City Manager 765 Portola Road Portola Valley, CA 94028		87884	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$23,868.78	\$23,868.78	Protective Claims

Claims To Be Expunged Totals		Count:17			\$2,873,447.37	\$77,616.90	\$234,882.00	\$7,111,053.06	\$10,296,999.33	
------------------------------	--	----------	--	--	----------------	-------------	--------------	----------------	-----------------	--

Case# 19-30088 Doc# 13109-1 Filed 01/14/22 Entered 01/17/22 23:59:06 Page 54 of 76

Case# 19-35088 Doc# 13382-1 Filed 10/14/22 Entered 10/10/22 23:59:06 Page 5
72 of 96

Case: 19-30018 Doc#: 13086-1 Filed: 10/10/22 Entered: 10/10/22 22:59:06 Page 6 of 7

Exhibit 1A

Case: 19-30088 Doc#: 103909-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 57
 Case: 19-30088 Doc#: 103909-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 57
 Case: 19-30088 Doc#: 103909-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 57

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Mad Heydenfeldt, Agent, Rasar, on behalf of United Trust Fund Mad Heydenfeldt 5255 Clayton Blvd #210 Concord, CA 94521		4606	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$250,000,000.00	\$250,000,000.00	Barred by Statute of Limitations - Breach of Written Contract
Man, Geoffrey Law Offices of Paul Aghabala & Associates, Inc./Ani Agvaladyan, Esq. 15250 Ventura Blvd Ste 500 Syeran Oaks, CA 91403-3217		23522	PG&E Corporation	9/30/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Man, Geoffrey Intigie Law Firm, P.C. Ani Agvaladyan, Esq. P.Paul Aghabala, Esq. 15250 Ventura Blvd., Suite 500 Syeran Oaks, CA 91403		105758	PG&E Corporation	6/2/2020	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Nos, Leona A 220 Coombe Hill Drive San City, CA 92586		86900	Pacific Gas and Electric Company	10/23/2019	\$0.00	\$0.00	\$0.00	\$14,000,000.00	\$14,000,000.00	Barred by Statute of Limitations - Personal Injury
Donick, John 64 Willow Valley Road Mad City, CA 95959		19917	PG&E Corporation	10/9/2019	\$25,000.00	\$0.00	\$0.00	\$225,000.00	\$250,000.00	Barred by Statute of Limitations - Damage to Real or Personal Property and No Liability Based on Investigation
Claims To Be Expunged Totals		Count:13			\$198,304.00	\$0.00	\$0.00	\$12,450.00	\$321,249,073.78	\$321,459,827.78

Case#: 19-30088 Doc# 13084-1 Filed: 10/10/2022 Entered: 10/10/2022 15:06:55 Page 58

Case#: 19-30088 Doc#: 13184-1 Filed: 10/10/22 Entered: 10/10/22 12:59:16 Page 9
76 of 76

Redacted Version of Exhibit 1B

Case: 19-30088 Doc# 130196-1 Filed: 10/10/2022 Entered: 10/10/2022 15:00:58 Page 77

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	8/1/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Employment Discrimination
Redacted		Redacted	PG&E Corporation	8/12/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - Breach of Written Contract and Preempted by NLRA
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted		Redacted	PG&E Corporation	10/18/2019	\$0.00	\$0.00	\$10,000.00	\$1,690,000.00	\$1,700,000.00	Barred by Court Order
Redacted		Redacted	PG&E Corporation	10/7/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	10/4/2019	\$0.00	\$0.00	\$13,300,000.00	\$0.00	\$13,300,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	10/17/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	11/4/2019	\$0.00	\$12,961,000.00	\$0.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims

Redacted Version of Exhibit 1B

Case: 19-30088

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims

Claims To Be Expunged Totals

Count:25	\$0.00	\$12,961,000.00	\$103,305,772.96	\$16,709,450.00	\$132,976,222.96
----------	--------	-----------------	------------------	-----------------	------------------

Doc# 130088-1 Filed 10/10/2022 Entered 10/10/2022 15:00:58 Page 178 of 196

Exhibit 1

CLAIMS TO BE DISALLOWED AND EXPUNGED

SURVIVING CLAIMS

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (I)	Basis For Objection	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (I)
ARAMARK UNIFORM & CAREER FURNITURE, LLC	20022	Pacific Gas and Electric Company	\$0.00 (S) \$7,268.44 (A)	Amended and Superseded	ARAMARK Uniform & Career Apparel LLC	107050	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A)
DAVID SHIMKIN COZEN O'CONNOR 601 S. FIGUEROA STREET, SUITE 3700 LOS ANGELES, CA 90017			\$0.00 (P)		c/o Sheila R. Schwager Hawley Troxell Ennis & Hawley LLP P.O. Box 1617 Boise, ID 83701			\$0.00 (P) \$2,521.54 (U) \$2,521.54 (T)
Asplundh Construction, LLC	17001	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Amended and Superseded	Asplundh Construction, LLC	107056	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)
David G. McGinley Vice President 708 Blair Mill Rd Spear Street Tower, Suite 2200 Willow Grove, PA 19090			\$4,170,913.06 (U) \$4,170,913.06 (T)		David G. McGinley Vice President 708 Blair Mill Rd. Spear Street Tower, Suite 2200 Willow Grove, PA 19090			\$3,430,436.16 (U) \$3,430,436.16 (T)
Franchise Tax Board Bankruptcy Section MS A340 PO Box 2952 Sacramento, CA 95812-2952	63369	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$501,616,189.6 (P) \$86,760,132.37 (U) \$588,376,321.9 (T)	Amended and Superseded	Franchise Tax Board Bankruptcy Section MS A340 PO Box 2952 Sacramento, CA 95812-2952	106177	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$500,625,512.1 (P) \$87,750,809.79 (U) \$588,376,321.9 (T)
Franchise Tax Board Bankruptcy Section MS A340 PO Box 2952 Sacramento, CA 95812-2952	63619	PG&E Corporation	\$0.00 (S) \$0.00 (A) \$502,117,359.1 (P) \$86,846,819.21 (U) \$588,964,178.3 (T)	Amended and Superseded	Franchise Tax Board Bankruptcy Section MS A340 PO Box 2952 Sacramento, CA 95812-2952	106175	PG&E Corporation	\$0.00 (S) \$0.00 (A) \$501,123,223.9 (P) \$87,840,954.34 (U) \$588,964,178.3 (T)
M Squared Construction, Inc. Mr. Stewart Mitchell & Mr. Aidan Foley 1278 20th Ave., Ste. C 777 Cuesta Drive, Ste. 200 San Francisco, CA 94122	60391	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$504,183.17 (U) \$504,183.17 (T)	Amended and Superseded	M Squared Construction, Inc. Mr. Stewart Mitchell Mr. Aidan Foley 1278 20th Ave., Ste. C San Francisco, CA 94122	107019	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$445,725.60 (U) \$445,725.60 (T)

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

Exhibit 1

Case: 19-30088 Doc# 13006-1 Filed: 10/10/22 Entered: 10/10/22 15:06:58 Page 8
806756

CLAIMS TO BE DISALLOWED AND EXPUNGED					SURVIVING CLAIMS		
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (I)	Basis For Objection	Name and Address of Claimant	Claim #	Debtor Claim Amount and Priority (I)
Treasurer of Virginia VIRGINIA DEPT OF THE TREASURY UNCLAIMED PROPERTY DIV PO BOX 2478 RICHMOND, va 23218-2478	17227	Pacific Gas and Electric Company	\$0.00 (S) \$0.00 (A) \$0.00 (P)	Amended and Superseded	Treasurer of Virginia Virginia Dept. of the Treasury Unclaimed Property Division P.O. Box 2478 Richmond, VA	103460	Pacific Gas and Electric Company \$0.00 (A) \$0.00 (P) \$1,214.96 (U) \$1,214.96 (T)

Original Creditor	Claim Transferred To:	Claims To Be Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted	Redacted	Redacted	Pacific Gas and Electric Company	10/2/2019	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00	Plan Passthrough Workers' Compensation Claims
Union Carbide Corporation Attention: Weslynn Patricia Reed 2211 West Dow Way Warren, MI 48090	Redacted	86586	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Plan Passthrough Environmental Claims
Union Carbide Corporation Attention: Weslynn Patricia Reed 2211 West Dow Way Warren, MI 48090	Redacted	78621	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Plan Passthrough Environmental Claims

Claims To Be Expunged Totals	Count:3	\$0.00	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00
------------------------------	---------	--------	--------	--------	--------	--------------	--------------

Exhibit 1

Case: 19-30088 Doc# 113006-1 Filed: 07/21/21 Entered: 07/21/21 16:40:10 Page 82

Principal Creditor	Claim Transferred To:	Claims To Be Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Maya, Jennifer Alexandra Ct San Jose, CA 95125-6252		7490	PG&E Corporation	8/19/2019	\$0.00	\$0.00	\$0.00	\$4,000.00	\$4,000.00	Customer No Liability / Passthrough Claims
Church of Christ 11 Florin Rd Sacramento, CA 95828-2413		87451	Pacific Gas and Electric Company	10/28/2019	\$0.00	\$0.00	\$334.40	\$0.00	\$334.40	Customer No Liability / Passthrough Claims
Castello, Teresa 133 Bluebird LN Sacramento, CA 95821-4553		6983	Pacific Gas and Electric Company	8/14/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Customer No Liability / Passthrough Claims
English, Georgia S 1409 Hamsher 4608 Elmhurst San Jose, CA 95129-2023		87203	Pacific Gas and Electric Company	10/24/2019	\$0.00	\$0.00	\$0.00	\$32.69	\$32.69	Customer No Liability / Passthrough Claims
Manendez, Norma 1229 Cabernet Drive San Jose, CA 95126		3876	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Customer No Liability / Passthrough Claims
Ryan, Carla 1409 West Anderson St. San Jose, CA 95206		88600	PG&E Corporation	12/13/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Customer No Liability / Passthrough Claims
Ryan, Arjamand 1133 Lyle Ave San Jose, CA 95210-6709		63817	PG&E Corporation	10/8/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Customer No Liability / Passthrough Claims
Miller, Madrid 1144 Mallard Court Livermore, CA 94533-2547		4421	Pacific Gas and Electric Company	7/30/2019	\$0.00	\$0.00	\$0.00	\$5,942.88	\$5,942.88	Customer No Liability / Passthrough Claims
Miller, Madrid 1144 Mallard Court Livermore, CA 94533-2547		4023	Pacific Gas and Electric Company	7/27/2019	\$0.00	\$0.00	\$0.00	\$5,942.58	\$5,942.58	Customer No Liability / Passthrough Claims
Sanchez, Angela 2739 Fine Ave Clovis, CA 93612		9606	Pacific Gas and Electric Company	9/23/2019	\$0.00	\$0.00	\$1,197.58	\$0.00	\$1,197.58	Customer No Liability / Passthrough Claims

Exhibit 1

Case: 19-30088 Doc# 13006-1 Filed: 10/10/22 Entered: 10/10/22 15:06:58 Page 83 of 96

Original Creditor	Claim Transferred To:	Claims To Be Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Smith, Carolyn 3888 Bridgeford Dr Sacramento, CA 95833-1100		4271	PG&E Corporation	7/29/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Customer No Liability / Passthrough Claims
Claims To Be Expunged Totals					\$0.00	\$0.00	\$1,531.98	\$15,918.15	\$17,450.13	



Signed and Filed: July 22, 2021

KELLER BENVENUTTI KIM LLP
Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Peter J. Benvenutti (#60566)
(pbenvenutti@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: 415 496 6723
Fax: 650 636 9251

DENNIS MONTALI
U.S. Bankruptcy Judge

Attorneys for Debtors and Reorganized Debtors

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**ORDER DISALLOWING AND EXPUNGING
PROOFS OF CLAIM PURSUANT TO
REORGANIZED DEBTORS' NINETY-THIRD
OMNIBUS OBJECTION TO CLAIMS (NO
LEGAL LIABILITY CLAIMS)**

[Re: Dkt. Nos. 10808, 10960]

1 Upon the *Reorganized Debtors' Report on Responses to Eighty-Eighth Through Ninety-Sixth*
2 *Omnibus Objections to Claims and Request for Orders by Default as to Unopposed Objections* [Docket
3 *No. 10960*] (the “**Request**”) of PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric
4 Company (the “**Utility**”), as debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**”
5 or as reorganized pursuant to the Plan (as defined below), the “**Reorganized Debtors**”) in the above-
6 captioned chapter 11 cases (the “**Chapter 11 Cases**”), pursuant to Rule 9014-1(b)(4) of the Bankruptcy
7 Local Rules for the United States District Court for the Northern District of California, as made
8 applicable to these Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and*
9 *Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”),
10 that the Court enter an order by default on the *Reorganized Debtors' Ninety-Third Omnibus Objection*
11 *to Claims (No Legal Liability Claims)* [Docket No. 10808] (the “**Ninety-Third Omnibus Objection**”),
12 all as more fully set forth in the Request, and this Court having jurisdiction to consider the Request and
13 the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, the Order Referring Bankruptcy
14 Cases and Proceedings to Bankruptcy Judges, General Order 24 (N.D. Cal.), and Bankruptcy Local Rule
15 5011-1(a); and consideration of the Request and the requested relief being a core proceeding pursuant to
16 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409;
17 and the Court having found and determined that notice of the Request as provided to the parties listed
18 therein is reasonable and sufficient under the circumstances, and it appearing that no other or further
19 notice need be provided; and this Court having determined that the legal and factual bases set forth in
20 the Request establish just cause for the relief sought; and upon all of the proceedings had before this
21 Court and after due deliberation and sufficient cause appearing therefor,

22 **IT IS HEREBY ORDERED THAT:**

- 23 1. The below Proofs of Claim shall be treated as follows:

Docket No.	Claimant	Claim No.	Resolution
10907	Duivenvoorden, Marcus	75903	The Reorganized Debtors will seek to resolve the Claim through the Court-approved ADR procedures, and request that the hearing on the Claim be taken off calendar and continued indefinitely in the interim.

Docket No.	Claimant	Claim No.	Resolution
10919	Chappell, Lamont	9946	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.
10918	California Department of Housing and Community Development	56868	This matter has been continued to the September 14, 2021 Omnibus Hearing.
Informal	City of San Carlos	68838	This matter has been continued to the August 10, 2021 Omnibus Hearing.
10946	Richards, Darwin	86933 96962	This matter is going forward contested at the July 28, 2021 Omnibus Hearing.

2. The Claims listed in the columns headed “Claims To Be Disallowed and Expunged” in **Exhibit 1A** and **Exhibit 1B**¹ hereto are disallowed and expunged.

3. This Court shall retain jurisdiction to resolve any disputes or controversies arising from this Order.

*** END OF ORDER ***

¹ **Exhibit 1B** has been redacted in accordance with the *Order Granting Motion to Redact Documents Filed in Support of Reorganized Debtors’ Omnibus Objections to Claims*, entered on June 21, 2021 [**Docket No. 10832**].

Exhibit 1A

Case: 19-30088

Doc#: 130088-1

876756

Principal Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Caplan, Warren Joseph Moroney, et al 5860 Owens Highway Suite 410 Pittsantion, CA 94588		78834	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Court Order
Caplan, Michael 80 Flynn Creek Road PO Box Capitche, CA 95427		81232	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$4,947.78	\$4,947.78	Barred by Court Order
Dejeston, Coaster 833 C" Street Apt. # 304 San Rafael, CA 94901		4457	PG&E Corporation	7/30/2019	\$0.00	\$0.00	\$12,450.00	\$2,487,550.00	\$2,500,000.00	No Liability Based on Investigation
Dejes, Donald Ray Corte Maria Hillsburg, CA 94565-4121		6888	PG&E Corporation	8/13/2019	\$0.00	\$0.00	\$0.00	\$500,000.00	\$500,000.00	Barred by Court Order
Johnson Aggregates Mid-Pacific, Joseph Audal 3000 Executive Freeway Suite 240 San Ramon, CA 94583		70657	Pacific Gas and Electric Company	10/16/2019	\$173,304.00	\$0.00	\$0.00	\$0.00	\$173,304.00	No Liability Based on Investigation
Latton, Ricky D. Rosemary Court Hayfield, CA 94533		87111	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$0.00	\$50,000,000.00	\$50,000,000.00	Barred by Statute of Limitations - Personal Injury
Motahari-Fard, Saeedeh Law Offices of Steven D. Moffman Attn: Saeedeh Motahari- Fard San Jose, CA 95128 San Jose, CA 94086		3882	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$31,576.00	\$31,576.00	Barred by Court Order
Perez, Juan M. Leon Law Firm, APC c/o James C Mitchell (SBN 87151) 1320 Cumbria Street, Suite 200 San Diego, CA 92101		7666	PG&E Corporation	8/20/2019	\$0.00	\$0.00	\$0.00	\$4,000,000.00	\$4,000,000.00	Barred by Court Order

Case: 19-30088 Doc# 10980-1 Filed: 07/22/21 Entered: 07/22/21 15:36:54 Page 1

Case: 19-30088 Doc#: 103909-1 Filed: 07/22/21 Entered: 07/22/21 15:36:54 Page 2 of 2

Original Creditor	Claim Transferred To:	Claims To Be Disallowed and Expunged	Debtor	Date Filed	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Mad Heydenfeldt, Agent, Rasar, on behalf of United Trust Fund	Mad Heydenfeldt 5255 Clayton Blvd #210 Concord, CA 94521	4606	Pacific Gas and Electric Company	7/24/2019	\$0.00	\$0.00	\$0.00	\$250,000,000.00	\$250,000,000.00	Barred by Statute of Limitations - Breach of Written Contract
Man, Geoffrey	Law Offices of Paul Aghabala & Associates, Inc./Ani Agvaladyan, Esq. 15250 Ventura Blvd Ste 500 Sherman Oaks, CA 91403-3217	23522	PG&E Corporation	9/30/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Man, Geoffrey	Intestige Law Firm, P.C. Ani Agvaladyan, Esq. P.Paul Aghabala, Esq. 15250 Ventura Blvd., Suite 500 Sherman Oaks, CA 91403	105758	PG&E Corporation	6/2/2020	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	No Liability Based on Investigation
Nos, Leona A	2120 Coombe Hill Drive San City, CA 92586	86900	Pacific Gas and Electric Company	10/23/2019	\$0.00	\$0.00	\$0.00	\$14,000,000.00	\$14,000,000.00	Barred by Statute of Limitations - Personal Injury
Donick, John	64 Willow Valley Road Nevada City, CA 95959	19917	PG&E Corporation	10/9/2019	\$25,000.00	\$0.00	\$0.00	\$225,000.00	\$250,000.00	Barred by Statute of Limitations - Damage to Real or Personal Property and No Liability Based on Investigation
Claims To Be Expunged Totals		Count:13			\$198,304.00	\$0.00	\$0.00	\$12,450.00	\$321,249,073.78	\$321,459,827.78

Redacted Version of Exhibit 1B

Case: 19-30088 Doc# 1300-1 Filed: 01/10/22 Entered: 01/10/22 15:06:58 Page 2
Case: 19-30088 Doc# 10980-2 Filed: 07/22/21 Entered: 07/22/21 15:36:54 Page 1
Case: 19-30088 Doc# 1300-1 Filed: 01/10/22 Entered: 01/10/22 15:06:58 Page 2

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	8/14/2019	\$0.00	\$0.00	\$0.00	\$1,600,000.00	\$1,600,000.00	Barred by Statute of Limitations - Personal Injury and Barred by Previous Settlement Agreement
Redacted		Redacted	Pacific Gas and Electric Company	10/12/2019	\$0.00	\$0.00	\$66,074.00	\$0.00	\$66,074.00	Preempted by NLRA
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Previous Settlement Agreement and Preempted by
Redacted		Redacted	Pacific Gas and Electric Company	10/18/2019	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Previous Settlement Agreement and Preempted by
Redacted		Redacted	Pacific Gas and Electric Company	4/20/2021	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	Barred by Statute of Limitations - "Catch-all" Statute
Redacted		Redacted	Pacific Gas and Electric Company	7/29/2019	\$0.00	\$0.00	\$20,000.00	\$0.00	\$20,000.00	Barred by Statute of Limitations - Breach of Written Contract and Preempted by NLRA
Redacted		Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,679,000.00	\$0.00	\$12,679,000.00	Payroll Withholding Claims
Redacted		Redacted	PG&E Corporation	9/25/2019	\$0.00	\$0.00	\$12,679,000.00	\$0.00	\$12,679,000.00	Payroll Withholding Claims

Redacted Version of Exhibit 1B

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted	Redacted	Redacted	Pacific Gas and Electric Company	9/16/2019	\$0.00	\$0.00	\$14,104.32	\$0.00	\$14,104.32	Barred by Previous Settlement Agreement
Redacted	Redacted	Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,570,000.00	\$0.00	\$12,570,000.00	Payroll Withholding Claims
Redacted	Redacted	Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$12,570,000.00	\$0.00	\$12,570,000.00	Payroll Withholding Claims
Redacted	Redacted	Redacted	PG&E Corporation	9/23/2019	\$0.00	\$0.00	\$0.00	\$11,728,000.00	\$11,728,000.00	Payroll Withholding Claims
Redacted	Redacted	Redacted	Pacific Gas and Electric Company	10/21/2019	\$0.00	\$0.00	\$0.00	\$1,450.00	\$1,450.00	Preempted by NLRA
Redacted	Redacted	Redacted	Pacific Gas and Electric Company	9/23/2019	\$0.00	\$0.00	\$15,000.00	\$0.00	\$15,000.00	Preempted by NLRA
Redacted	Redacted	Redacted	PG&E Corporation	10/23/2019	\$0.00	\$0.00	\$64,560.00	\$0.00	\$64,560.00	Barred by Statute of Limitations - Breach of Written Contract and Barred by Previous Settlement Agreement
Redacted	Redacted	Redacted	PG&E Corporation	10/22/2019	\$0.00	\$0.00	\$86,034.64	\$0.00	\$86,034.64	Barred by Statute of Limitations - Breach of Written Contract and Barred by Previous Settlement Agreement

Case#: 19-30088 Doc#: 13184-1 Filed: 10/10/22 Entered: 10/10/22 12:59:05 Page: 4
9 of 56

Redacted Version of Exhibit 1B

Case: 19-30088

Original Creditor	Claim Transferred To:	Claim To Be Disallowed and Expunged	Debtor	Date Filed:	Secured	Administrative	Priority	Unsecured	Total	Basis for Objection
Redacted		Redacted	PG&E Corporation	10/21/2019	\$0.00	\$0.00	\$12,961,000.00	\$0.00	\$12,961,000.00	Payroll Withholding Claims

Doc# 13008-1

Claims To Be Expunged Totals	Count:25	\$0.00	\$12,961,000.00	\$103,305,772.96	\$16,709,450.00	\$132,976,222.96
------------------------------	----------	--------	-----------------	------------------	-----------------	------------------

Case: 19-30088 Doc# 10980-2 Filed: 07/22/21 Entered: 07/22/21 15:36:54 Page 4

Office of the Clerk
United States Bankruptcy Court
Northern District of California

10/18/2022

Ricky-Dean Horton
751 Rosemary Court
Fairfield, CA 94533

Re: Deficiency Letter - PG&E Corporation, Case #19-30088 DM, Chapter 11

The Clerk's Office is unable to process your request for the following reason:

- ☒ Personal checks, debtor checks and third party checks are not accepted. Cashier's checks or money orders are required. Alternatively, a payment may be made through the Pay.Gov website.
- ☒ The check must be made payable to Clerk, U.S. Bankruptcy Court.
- ☐ The amount of your check is incorrect. Please resubmit for the correct amount of \$_____
- ☐ The check is not signed. Please sign and return back to the Court.
- ☒ Fee Required in the amount of **\$298.00** for the Notice of Appeal (dkt. #13084).
- ☐ Other: _____

Sincerely,
Edward J. Emmons
Clerk of Court

By: /s/Monica Tartaglia
Deputy Clerk

Notice Recipients

District/Off: 0971-3

User: rrombawa

Date Created: 10/18/2022

Case: 19-30088

Form ID: pdfntc

Total: 1

Recipients submitted to the Claims Agent (Kroll Restructuring Administration, LLC):
cr Ricky-Dean Horton 751 Rosemary Court Fairfield, CA 94533

TOTAL: 1

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

In Re: PG& E Corporation
and
Pacific Gas and Electric Company

Bankruptcy Case No. 19-30088-DM
Chapter 11

COURT CERTIFICATE OF MAILING

I, the undersigned, a regularly appointed clerk of the United States Bankruptcy Court for the Northern District of California, served a copy of the foregoing document(s):

Notice of Appeal to District Court- by Interested Party Ricky-Dean Horton- Dkt. #13084

Order Disallowing and Expunging Proofs of Claim Pursuant to Reorganized Debtors' Ninety-Third Omnibus Objection to Claims (No Legal Liability Claims)- Dkt. #10980

That I, in the performance of my duties as such Clerk, served a copy of the foregoing document(s) on the date shown below:

Office of the U.S. Trustee / SF
Phillip J. Burton Federal Building
450 Golden Gate Ave. 5th Fl., #05-0153
San Francisco, CA 94102

Ricky-Dean Horton
751 Rosemary Court
Fairfield, CA 94533

KELLER BENVENUTTI KIM, LLP
Tobias S. Keller
Jane Kim
Peter J. Benvenutti
650 California St., #1900
San Francisco, CA 94108
-and-

for **PG& E Corporation and
Pacific Gas & Electric Company**

WEIL, GOTSHAL & MANGES LLP
Stephen Karotkin
Ray C. Schrock, P.C.
Jessica Liou
Theodore E. Tsekerides
767 Fifth Ave.
New York, NY 10153-0119

Date: October 20, 2022

/s/ DaWana L. Chambers
Deputy Clerk